

Circuit Civil, #87
901 Main St., Ste. 201
Phone: (865) 992-5493

STATE OF
TENNESSEE
CIVIL SUMMONS

Case Number

3114

page 1 of 1

LEWIS, et al v. ALMEIDA, et al

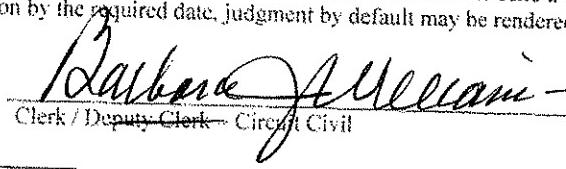
Served On:

CARMAX . . . , INC

c/o Corporation Service Company, 2908 Poston Ave., Nashville, TN 37203-1312.

You are hereby summoned to defend a civil action filed against you in Circuit Civil, Union County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the required date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: 10/29/13


Barbara Williams -
Clerk / Deputy Clerk - Circuit Civil

Attorney for Plaintiff: Richard L. Lewis

P. O. Box 365, Maynardville, TN 37807

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA §26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to execute it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to: Barbara Williams, Circuit Civil Clerk, Union County

901 Main Street, Suite 201, Maynardville, TN 37807

CERTIFICATION (IF APPLICABLE)

I, Barbara Williams, Clerk of Union County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk - Circuit Civil

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows:

Date: _____

By: _____

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____, On _____, I received the return receipt, which had been signed by _____ on _____, The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)
(Attach return receipt on back)

ADA: If you need assistance or accommodations because of a disability, please call Ann Dyer at ADA Coordinator, at (865) 992-3061.

Rev. 8/05/10

RICHARD LEWIS, in *PROPRIA PERSONA*
and *EX REL* as a Private Attorney General
For the Citizens of Tennessee and the
People of the United States of America

P. O. Box 365

Maynardville, TN 37807

For Plaintiffs:

RICHARD LEWIS;

RICHARD L. LEWIS III;

LORRAINE K. LEWIS;

SCOTT E. LEWIS;

MINOR CHILD NO. 1;

MINOR CHILD NO. 2;

MINOR CHILD NO. 3;

MINOR CHILD NO. 4;

NELLE S. PAEGEL;

THOMAS W. PAEGEL;

THOMAS W.V. PAEGEL;

THE BODY COMPANY SPORTS, INC.

COPY

FILED

OCT 29 2013

CIRCUIT COURT
CLERK

EIGHTH JUDICIAL DISTRICT OF TENNESSEE
UNION COUNTY CIRCUIT COURT AT MAYNARDVILLE

RICHARD LEWIS, an individual in *propria persona* and *ex rel* as Private Attorney General;
LORRAINE K. LEWIS, an individual;
RICHARD L. LEWIS III, an individual;
SCOTT E. LEWIS, an individual;
MINOR CHILD 1, age 6, an individual;
MINOR CHILD 2, age 8, an individual;
MINOR CHILD 3, age 3, an individual;
MINOR CHILD 4, age 7, an individual;
NELLE, Esq., a licensed California attorney and individual;
THOMAS W. PAEGEL, an individual;
THOMAS W.V. PAEGEL, an individual;
THE BODY COMPANY SPORTS, INC., a Nevada corporation;
and DOES 1-300 inclusive.

Plaintiffs
v.
PETE E. ALMEIDA, an individual;
AMERICAN EXPRESS TRAVEL RELATED

-) JURY DEMAND
-) CASE DOCKET NO: 3114
-) THIS CASE IS TO BE CLASSIFIED AS "COMPLEX"
-) UNLIMITED CIVIL; EXHIBITS 1-95;
-) REQUEST FOR GAG ORDER;
MOTION FOR PRELIMINARY INJUNCTION
-) JUDGE: Hon. John D. McAtee
-) H.R.C. DATE:
-) TIME:
-) COMPLAINT FOR DAMAGES FOR THE FOLLOWING CAUSES OF ACTION:
 -) OBSTRUCTION OF JUSTICE (INCLUDING, BUT NOT LIMITED TO: JUDICIAL

COMPLAINT

Page 1

1 SERVICES COMPANY, INC., a New York) RACKETEERING; JUDICIAL BIAS;
2 corporation and their agents and Affiliates;) COLLUSION; FAILING TO
3) ADJUDICATE, TECHNOLOGY
4 BIBI BAC, mediator in Charlotte County,) HACKING, WIRE TAPPING
5 Florida;) ATTEMPTED MURDER;
6 JEAN-RENE BASLE, San Bernardino County) DUE PROCESS; CONSPIRACY;
7 Counsel;) PERJURY; BRIBERY;
8 BEVERLY HILLS POLICE DEPARTMENT,) DEFAMATION; FALSE REPORTING;
9 the police department of the City of Beverly) TAX FRAUD; ASSAULT; ELDER
10 Hills;) ABUSE; EXTRINSIC FRAUD)
11 WILLIAM BEATY, an individual;) 2) GRAND THEFT BY FALSE
12 CORBIN BLEU, an individual;) PRETENSES AND FINANCIAL
13 THOMAS JAMES BORRIS, an individual and) ABUSE OF ELDERLY AND DISABLED
14 Orange County Superior Court Presiding Judge,)) 3) CONSPIRACY UNDER RICO
15 California;) 4) EXTORTION, ATTEMPTED
16 KENNETH GEORGE CAMPION, an individual) EXTORTION AND BLACKMAIL
17 and DBA: KENNETH G. CAMPION, a) 5) CREDIT/DEBIT CARD FRAUD
18 California professional corporation;) AND PHISHING
19 CARMAX AUTO SUPERSTORES, INC. AKA:) 6) CHILD ENDANGERMENT AND
20 CARMAX AUTO SUPERSTORES SERVICES,) CHILD ABUSE
21 INC., a Virginia Corporation;) 7) UNFAIR AND DECEPTIVE ACTS OR
22 HON. LISA HART COLE, an individual and) PRACTICES IN COMMERCE.
23 Los Angeles Superior Court Judge, California;) 8) FRAUD BY INTENTIONAL OR
24 LYDIA CORNELL AKA: LYDIA CORNELL) FRAUDULENT
25 KORNILOFF, and unlicensed DBAs: LYDIA) MISREPRESENTATION AND
26 CORNELL ENTERPRISES; GODSHOTSTM) FALSELY VESTED BANK
27 L.L.C. (unregistered as a trademark or L.L.C.);) ACCOUNTS
28 GODSHOTS.ORG; RECOVERY GODSHOTS;) 9) FRAUD BY NEGIGENT
LC ENTERTAINMENT GROUP; VENUS) MISREPRESENTATION
FILMS AND PRODUCTIONS; MILITARY) 10) FRAUD BY FRAUDULENT
GODSHOTS, LYDIA CORNELL KORNILOFF) INDUCEMENT TO ENTER INTO
VENUS FILMS AND PRODUCTIONS; and all) CONTRACT
other unlicensed and unregistered DBAs;) 11) INDUCEMENT TO COMMIT FRAUD
MEKI COX, an individual; AKA MEKI L. COX)) 12) CONVERSION
MEKI LYNN COX, MERI LYNN COX, MEKI) 13) GRAND LARCENY THEFT OF
C. JAKLITCH, MEKI JAKLITCH, MEKI L.) PERSONAL PROPERTY
14) GRAND THEFT OF MATERIAL
15) UNFAIR COMPETITION BY
TORTIOUS INTERFERENCE WITH
EXISTING BUSINESS RELATION-
SHIP; PROCUREMENT OF BREACH
OF CONTRACT
16) UNAUTHORIZED PRACTICE OF
LAW
17) BREACH OF CONTRACT
18) BREACH OF COVENANT OF

- 1 COXJAKLITSCH, MEKI SELMAN and) GOOD FAITH AND FAIR DEALING
 2 unlicensed DBAs: LYRIX ENTERPRISES;) 19) INTENTIONAL INTERFERENCE
 3 LYRIXENTERPRISES.COM; EVENT) WITH CONTRACTUAL
 4 STAFFING PROFESSIONALS;) RELATIONSHIPS
 5) 20) FRAUD AND ABUSE INCLUDING
 6 GEORGE DEL JUNCO, an individual and) ELDERLY ABUSE VIA THE
 7 unlicensed DBA: GREEN NETWORK;) INTERNET; COMPUTER FRAUD
 8) AND ABUSE; ABUSE OF THE
 9 ELIDA DEL TORO, an individual and) DISABLED
 10 unlicensed DBA: GREEN NETWORK;) 21) INTERNET PIRACY
 11 LEE SMALLEY EDMON, an individual and Los) 22) NEGLIGENCE/GROSS
 12 Angeles Superior Court, California (formerly) NEGLIGENCE
 13 Presiding Judge);) 23) GRAND THEFT BY
 14 eSTARHD, an internet business of unknown) EMBEZZLEMENT
 15 derivation;) 24) FALSE LIGHT INVASION OF
 16 HANY FANGARY, an individual;) PRIVACY, PHISHING
 17 FARMER'S INSURANCE COMPANY, INC., a) 25) COMPUTER FRAUD AND ABUSE,
 18 California corporation, AKA FARMERS;) INTERNET HACKING, PHISHING,
 19 FARMERS INSURANCE GROUP;) SPOOFING, AND CYBER-CRIMES
 20 DAVID FLEMING, an individual and officer of) 26) HARASSMENT AND INTENTIONAL
 21 unlicensed DBA: eSTAR.TV) INFILCTION OF EMOTIONAL
 22 JAMES HILLIS FORD, an individual;) DISTRESS
 23 JACK W. GOLDEN, County Counsel of Orange) 27) FILING FALSE REPORTS WITH
 24 County, California;) GOVERNMENT AGENCIES
 25 (ALLEN) KELSEY GRAMMER, an individual) 28) INSURANCE BAD FAITH
 26 and DBAs: GRAMMNET, INC., a California) 29) BUSINESS INTERFERENCE
 27 corporation; GRAMMNET PRODUCTIONS, a) 30) DEFAMATION
 28 California corporation; GRAMMNET NH) 31) VIOLATIONS OF STATE AND
 29 PRODUCTIONS, a California corporation;) FEDERAL RULES OF DISCOVERY
 30 GRAMMNET NH, INC., California corporation;) 32) INCOME TAX FRAUD AND
 31 GRAMNET GLOBAL, LLC, a California) EVASION
 32 limited liability company; SOLSTICE) 33) MONEYLAUNDERING
 33 PROPERTIES, a California corporation;) 34) COPYRIGHT INFRINGEMENT
 34 WORLD CUP COMEDY, LLC, a California) 35) COPYRIGHT PIRACY
 35 Limited liability company; ASTERISK, LLC, a) 36) FAILURE TO PROPERLY
 36 California limited liability company (canceled);) SUPERVISE/SUBORNATION OF
 37 C2CHANNEL CHANNEL, LLC, a California) ILLEGAL ACTS
 38 limited liability company; G3 MEDIA, LLC, a) 37) FAILURE TO SELF-REPORT
 39) 38) ASSAULT
 40) 39) FALSE IMPRISONMENT/ARREST
 41) 40) PREDATORY LENDING/USURY
 42) COMPENSATORY DAMAGES AND
 43) ATTORNEYS FEES AND COSTS
 44) (TREBLED); PUNITIVE DAMAGES

1 California limited liability company; NELSON) REQUESTS FOR DECLARATORY
2 PAGE ENTERTAINMENT, INC., a California) RELIEF; CONSTRUCTIVE TRUST and
corporation; KELSEY GRAMMER) PRELIMINARY INJUNCTION;
3 CHARITABLE FOUNDATION a California)
corporation (suspended); GRAMMNET NH,)
INC., a California corporation;
4)
5 ARTHUR HADDOCK, an individual;
6)
7 RAYMOND HAIGHT, III, an individual and)
Judge of the San Bernardino Superior Court,)
California;
8)
9 PAUL HAYELAND, an individual; AKA PAUL)
HAYLAND, PAUL AYELAND, PAUL)
AYLAND, PAUL CORNELL; and unlicensed)
DBAs: SPORTS ICON ENTERTAINMENT;)
GODSHOTS.TV, SPORTS ICON IMAGES;)
GSAXE.COM;
10)
11)
12 IVAN JACKSON, director, treasurer, and)
secretary of TSOFTINET, INC;
13)
14 MARTHA KEHOE, an individual;
15)
16 CASEY KEITH, an individual and unlicensed)
DBA: AV COMPUTER DOCTOR;
17)
18 S. MARTIN KELETI, an individual;
19)
20 STEPHANIE M. KING an individual and license)
DBAs: STEPHANIE KING, D.C.; STEPHANIE)
KING, INC., a California Corporation; and)
unlicensed DBAs: BODY SLIMMING)
EXPERTS; ADVANCED HEALTH)
CONCEPTS; DEDICATEDTOHEALTH.COM;)
21)
22)
23 JOHN KRATTI, County Counsel for Los)
Angeles County, California;
24)
25 MARYLAND CASUALTY CO., a Maryland)
Corporation;
26)
27 MASTERCARD, INC., a New York corporation;)
AKA MASTERCARD INTERNATIONAL;)
28)

) 18 U.S.C. §§1961-1968, *et seq.*; FTC Regs.;
) HOBBS Act 18 U.S.C. §1951; 18 U.S.C.
) §§201, 202-209; The Federal Extortion and/
or Blackmail Act, 18 U.S.C. §§ 872, 875-877;
) The Identity Theft Enforcement and
Restitution Act of 2008, 18 U.S.C. §1030;
) Grand Larceny; Stalking 18 U.S.C. 2261A *et
seq.*; Mail Fraud 18 U.S.C. § 1341; Wire
Fraud 18 U.S.C. § 1343; Extortion 18 U.S.C.
§ 875; Americans with Disabilities Act of
1990, 42 U.S.C. § 12131; U.S.A. Patriot Act of
2001,) 42 U.S.C § 5195; Homeland Security
Act of 2002, 6 U.S.C. 101; 18 U.S.C. § 1956;
12 U.S.C. § 2605(e); (2)(A) and (e)(3), ABA
Model Code of Judicial Conduct (CANONS);
Model Rules of Attorney Conduct; 18 U.S.C.
§§ 2261 *et seq.*, 2262, and 2265; 42 U.S.C. §
1983;
T.C.A. § 39-12-201 *et seq.*; T.C.A. § 39-16-
602 *et seq.*; T.C.A. § 39-16-705; T.C.A. § 39-1-
602(b)(4); T.C.A. § 39-14-602(a);
T.C.A. § 39-14-101; T.C.A. § 39-14-103 thru
105; T.C.A. § 39-12-201 *et seq.*;
Moneylaundering T.C.A. § 39-14-903 *et seq.*;
Gangs ACT; Tenn. Code § 39-14-112; Tenn.
Code §106 (2007); T. C. A. § 39-14-118;
Tenn. Code Ann. § 39-14-102(2);
Tenn. Code Ann. § 39-14-102(3);
Tenn. Code Ann. § 39-11-106(a)(9); Tenn.
Code Ann. § 39-11-106(a)(26); Tenn. Code
Ann. § 39-14-102(5); Tenn. Code Ann.
§ 39-11-106(a)(20); Tenn. Code Ann. § 39-11-
301(a)(2); Tenn. Code Ann. § 39-11-
106(a)(18); Tenn. Code Ann. § 39-11-106
(a)(28); Tenn. Code Ann. § 39-11-106(a)(34);
Tenn. Code Ann. § 39-14-102(10); Tenn.
Code Ann. § 39-14-102(4); Tenn. Code Ann.
§ 39-11-106(a)(13); Tenn. Code Ann. § 39-
14-105; Tenn. Code Ann. § 39-14-118(c)(1);
Tenn. Code Ann. § 39-14-118(c)(2); T.P.I. –
Crim. 4.01 (Attempt); ICAC Program; TCA
39-15-401; T.C.A. § 39-14-127; T.C.A. § 39-

1 MERITUS PAYMENT SOLUTIONS, a credit) 14-127; §47-18-104; Uniform Deceptive
2 card processor of unknown registration;) Trade Practices Act No. §47-18-101 et seq.;
3 ALLEN S. MILLER, an individual and all) Tennessee Consumer Protection Act of 1977
4 aliases and unlicensed DBAs: HITMAN PR;) § 47-18-104; ; FAC statutes for caregiving/
5 ADVANCED KINEMATIC SOLUTIONS;) caregivers; 2010 Tennessee Code, Title 47,
6 LABOR MEDICAL MANAGEMENT) Uniform Deceptive Trade Practices Act No.
7 SYSTEMS; LMMS;) §47-18-101 et seq.; Tennessee Consumer
8 THE MILNER GROUP, LLC, a) Protection Act of 1977 § 47-18-104; T.C.A.
9 revoked California limited liability company;) § 39-14-127; §47-18-104; Uniform Deceptive
10 PHILLIP MULLIGAN, an individual and) Trade Practices Act No. §47-18-101 et seq.;
11 officer of TSOFTNET, INC.;) Tennessee Consumer Protection Act of 1977
12 ROBERT MELVIN NEWELL, JR., an) § 47-18-104; FL statute for caregiving
13 individual;) §39.5085(2)(f); T.C.A. § 39-14-101; FTC
14 BARBARA NIVEN, AKA Barbara Lee Buholz,) Regulations; T.C.A. § 40-35-111;
15 an individual; and DBA: BARBARA NIVEN) T.C.A. §§ 56-8-103 through 108; T.C.A.
16 ENTERPRISES, INC., a California corporation;) § 47-50-109; Uniform Deceptive Trade
17 JAN A. PLUIM, an individual and Judge of the) Practices Act § 47-18-104 & 108
18 Los Angeles County Superior Court, California) and Improper Conduct 23-3-103; Tennessee
19 (retired);) Adult Protection Act of 1978, T.C.A CH. 6,
20 JAMES D. ROBERTS, an individual;) PT. 1 §§ 71-6-101 and 120; Ariz. Revised
21 DAVID M. ROBINSON, an individual and) Stat. §46-455; Fl. Stat. § 825.102; Ca.
22 DBAs: THE MILNER GROUP, LLC, THE) Welfare and Institutions Code § 15610.07;
23 JUSTICE FIRM, JUSTICE IMMIGRATION,) Ca. Code of Civ. Proc. § 527.6; T.C.A. §
24 JUSTICE SECURITIES;) 71-6-120 et seq. Tenn. Adult Protection Act;
25 MARK SCHWARTZ, an individual and) Ca. Fair Political Practices Commission;
26 Detective, City of Beverly Hills Police) Tenn. Code § 39-13-302; Consumer Credit
27 Department, California;) Protection Act (CCPA)and anti-usury laws;
28 RANDALL J. SHERMAN, an individual and) T.C.A. §56-7-105; T.C.A. § 39-12-101;
29 Judge of Orange County Superior Court,) T.C.A. § 39-12-102; T.C.A. § 39-12-103;
30 California;) T.C.A. § 39-13-302; T.C.A. § 39-13-304;
31 GENE SIMMONS, an individual and DBA:) T.C.A. § 39-14-903; T.C.A. § 39-17-315;
32 GENE SIMMONS AXE and unlicensed DBAs:) T.C.A. § 39-17-309; T.C.A. § 39-24-120;)
33 AXE LTD, GSAXE;) T.C.A. § 39-14-105; T.C.A. § 39-14-602(a);
34) T.C.A. § 39-11-118; T.C.A. § 39-16-602 et seq;
35) T.C.A. § 39-13-101 et seq;
36) T.C.A. § 39-16-102; T.C.A. § 39-16-705;
37) T.C.A. § 39-16-702; T.C.A. § 39-12-204;
38) T.C.A. § 39-15-401 et seq;
39) T.C.A. §39-15-101
40)
41)
42)
43)
44)
45)
46)
47)
48)
49)
50)

1 MARSHA SLOUGH, an individual and)
2 Presiding Judge of San Bernardino County)
3 Superior Court, California;)
4 STAROPOLY, LLC, a Nevada limited liability)
5 company managed by TSOFTNET, INC)
6 (revoked);)
7 D'CARREY STELL, an individual)
8 CINDY THOMAS, an individual and clerk of)
9 Los Angeles Superior Court, California;)
10 TSOFTNET, INC, a Nevada corporation;)
11 TODHD, a subsidiary of TSOFTNET, INC, or)
12 other company;)
13 BARBARA VARGAS, an individual and clerk of)
14 Los Angeles Superior Court, California;)
15 ALEX VARONOS, AKA ALEX VARONAS,)
16 ALEX ZARONOS, ALEX ZAMBONI, and all as)
17 unknown AKAs, an individual and officer of)
18 VIEWPARTNER CORPORATION;)
19 VIEWPARTNER CORPORATION, a Nevada)
20 corporation;)
21 EDWARD WALSH, an individual;)
22 JAMES MICHAEL WELCH, Judge of)
23 the San Bernardino Superior Court (retired);)
24 WELLS FARGO BANK, LTD., a California)
25 corporation and their agents and Affiliates;)
26 WELLS FARGO SACRAMENTO; a California)
27 company; WELLS FARGO AND COMPANY, a)
28 California corporation; WELLS FARGO BANK)
NATIONAL ASSOCIATION CALIFORNIA, a)
Tennessee Corporation;)
DAVID S. WESLEY, an individual and)
Presiding Judge of Los Angeles Superior Court;)
LLOYD WESTBROOK, an individual;)

1 KEITH G. WILEMAN, an individual;)
2 CRAIG T. WORMLEY, an individual and)
3 DBAs: THE MILNER GROUP, LLC; JUSTICE)
4 IMMIGRATION; THE JUSTICE FIRM;)
5 XIAOYI YAO, an individual;)
6 ZURICH IN NORTH AMERICA, DBA:)
7 AMERICAN INSURANCE COMPANY, a)
8 California corporation and all)
9 Agents, Affiliates, and Subsidiaries;)
and DOES 1-300 INCLUSIVE,)
Defendants)
)

10 PARTIES
11

12 RICHARD LEWIS, P.O. Box 365, Maynardville, TN 37807.

13 LORRAINE K. LEWIS, address protected, contact RICHARD LEWIS at P.O. Box 365,
Maynardville, TN 37807.

14 RICHARD L. LEWIS III, address protected, contact RICHARD LEWIS at P.O. Box 365,
Maynardville, TN 37807.

15 SCOTT E. LEWIS, address protected, contact RICHARD LEWIS at P.O. Box 365, Maynardville,
TN 37807.

16 MINOR CHILD 1, address protected, contact RICHARD LEWIS at P.O. Box 365, Maynardville,
TN 37807.

17 MINOR CHILD 2, address protected, contact RICHARD LEWIS at P.O. Box 365, Maynardville,
TN 37807.

18 MINOR CHILD 3, address protected, contact RICHARD LEWIS at P.O. Box 365, Maynardville,
TN 37807.

19 MINOR CHILD 4, address protected, contact RICHARD LEWIS at P.O. Box 365, Maynardville,
TN 37807.

20 NELLE S. PAEGEL, 231 S. Glendora Ave, Glendora, CA 91741.

21 THOMAS W. PAEGEL, 231 S. Glendora Ave, Glendora, CA 91741.

1 **THOMAS W. V. PAEGEL**, 231 S. Glendora Ave, Glendora, CA 91741.
2 **THE BODY COMPANY SPORTS, INC**, 231 S. Glendora Ave, Glendora, CA 91741.
3 **PETE E. ALMEIDA**, c/o Veatch Carlson, L.L.P., 700 S. Flower St., 22nd Fl., Los Angeles, CA
4 90017-4209.
5 **AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.**, c/o CT
6 Corporation System, 111 Eighth Avenue, New York, New York 10011.
7 **BIBI BAC**, Mediation Program, Administrative Office of the Courts, 20th Judicial Circuit of Florida,
8 1700 Monroe Street, Fort Myers, FL 33901.
9 **JEAN-RENE BASLE**, 385 N. Arrowhead Avenue, San Bernardino, CA 92415-0120.
10 **WILLIAM BEATY**, 81 Newport Ave., Santa Ana, CA 92705.
11 **BEVERLY HILLS POLICE DEPARTMENT**, c/o David Snowden, Chief of Police, 464 N.
12 Rexford Dr., Beverly Hills, CA 90210.
13 **CORBIN BLEU** c/o Neil E. Meyer, Stone Meyer, & Genow, 9665 Wilshire Boulevard Suite 510
14 Beverly Hills, CA 90212.
15 **THOMAS JAMES BORRIS**, Presiding Judge, Orange County Superior Court, 700 Civic Center
16 Drive West. Santa Ana, California 92701.
17 **CARMAX AUTO SUPERSTORES, INC**, c/o Corporation Service Company, 2908 Poston Ave.,
18 Nashville, TN 37203-1312.
19 **KENNETH GEORGE CAMPION and DBA**, 10419 Bogardus Avenue, Ste. 100, Whittier, CA
20 90603
21 **LISA HART COLE**, c/o Presiding Judge David S. Wesley, 111 N. Hill St., Los Angeles, CA 90012-
22 3014.
23 **LYDIA CORNELL and all aliases and DBAs**, 300 S. Crescent Street, Beverly Hills, CA 90212.
24 **MEKI COX and aliases and DBAs**, 44519 10th Street, West Lancaster, CA 93534.
25 **GEORGE DEL JUNCO and DBA**, 1643 Larkvane Road, Rowland Heights, CA 91748.
26 **ELIDA DEL TORO and DBA**, 1643 Larkvane Road, Rowland Heights, CA 91748.
27 **LEE SMALLLEY EDMON**, c/o Presiding Judge David S. Wesley, 111 N. Hill St., Los Angeles, CA
28 90012-3014.

1 **ESTARHD**, c/o David Fleming, 5016 Kester, Apt. 211, Sherman Oaks, CA 91703.

2 **HANY FANGARY** c/o Velasco Law Group, 100 W. Broadway, Ste. 255, Long Beach, CA 90802.

3 **FARMERS INSURANCE COMPANY, INC.** c/o Doren E. Hohl, 4680 Wilshire Blvd, Los
4 Angeles, CA 90010.

5 **DAVID FLEMING** and DBAs, 5016 Kester, Apt. 211, Sherman Oaks, CA 91703.

6 **JAMES HILLIS FORD**, address unknown.

7 **JACK W. GOLDEN**, 333 W. Santa Ana Blvd, #407, Santa Ana, CA 92702.

8 **(ALLEN) KELSEY GRAMMER**, 11 E. Walton St., Apt. 3002, Chicago, Ill. 60611-5405.

9 **KELSEY GRAMMER DBAs:** c/o Jeff W. Lane, 11400 W. Olympic Blvd., Ste.200, Los Angeles,
10 CA 90064.

11 **ARTHUR HADDOCK**, 3643 47th St. N., St. Petersburg, FL 33713.

12 **RAYMOND L. HAIGHT, III**, c/o Presiding Judge Marsha Slough, 303 W. Third St., 4th Floor,
13 San Bernardino, CA 92415-0302.

14 **PAUL HAYELAND**, aliases and DBAs, c/o Gene Simmons, 2650 Benedict Canyon Dr., Beverly
15 Hills, CA 90210.

16 **IVAN JACKSON** at TSOFTNET, INC. c/o Davine Henderson, LLC, 2533 N. Carson St., Carson
17 City, NV 89076.

18 **MARTHA KEHOE**, 6238 Berkeley St., Englewood, Florida, 34224.

19 **CASEY KEITH** and DBA, 44519 10th St West Lancaster, CA 93534.

20 **S. MARTIN KELETI**, 8340 Melrose Avenue Los Angeles, CA, US 90069-5420.

21 **STEPHANIE KING** and aliases and DBAs, 375 E. Huntington Drive, Ste. B, San Marino, CA
22 91106.

23 **JOHN KRATTI**, 648 Kenneth Hahn Hall of Administration Los Angeles, CA 90012-2713.

24 **MARYLAND CASUALTY CO.**, c/o CSC-Lawyers Incorporating Service Company, 7 St. Paul
25 Street, Ste. 1660, Baltimore, MD 21202.

26 **MASTERCARD WORLDWIDE**, c/o Mastercard Int'l General Counsel, 2000 Purchase Street,
27 Purchase, NY 10577 U.S.A.

28

1 **MERITUS PAYMENT SOLUTIONS**, 1901 E. Alton Parkway, Ste. 220, Santa Ana, CA 92705-
2 5849.

3 **ALLEN S. MILLER** and all aliases and DBAs, 541 Linwood Ave. Unit "C," Monrovia, CA 91016.

4 **THE MILNER GROUP, LLC** c/o David Robinson, 715 S. Barrington Ave., Apt. D, Los Angeles,
5 CA 90049.

6 **PHILLIP MULLIGAN**, President and Director of TSOFTNET, INC. c/o Davine Henderson, LLC,
7 2533 N. Carson St., Carson City, NV 89076.

8 **ROBERT MELVIN NEWELL, JR.**, c/o Newell, Campbell & Roche, LLP, Biltmore Court, 520 S.
9 Grand Avenue, Suite 390, Los Angeles, CA 90071.

10 **NELSON PAGE ENTERTAINMENT, INC.**, c/o Wayne Page, 1066 Charles St., Pasadena, CA
11 91103.

12 **BARBARA NIVEN ENTERPRISES, INC.**, attn: Barbara Niven, all alias(s) and DBAs, c/o
13 **LEGALZOOM.COM, INC.**, 100 W. Broadway, Ste 100, Glendale, CA 91210.

14 **JAN A. PLUIM**, c/o Presiding Judge David S. Wesley, 111 N. Hill St., Los Angeles, CA 90012-
15 3014.

16 **JAMES D. ROBERTS**, 20301 Ventura Blvd., Ste. 351, Woodland Hills, CA 91364.

17 **DAVID M. ROBINSON** and DBAs, 715 S. Barrington Ave., Apt. D, Los Angeles, CA 90049.

18 **MARK SCHWARTZ**, c/o David Snowden, Chief of Police, City of Beverly Hills Police
19 Department, 464 N. Rexford Dr., Beverly Hills, CA 90210.

20 **RANDALL J. SHERMAN**, c/o Thomas James Borris, Presiding Judge, Orange County Superior
21 Court, 700 Civic Center Drive West. Santa Ana, California 92701.

22 **GENE SIMMONS** and DBAs, c/o Nat'l. Registered Agents, Inc., 818 W. Seventh St., Los Angeles,
23 CA 90017.

24 **MARSHA SLOUGH**, 303 W. Third Street, 4th Floor, San Bernardino, California 92415-0302.

25 **STAROPOLY, LLC**, c/o Laughlin Associates, Inc., 2533 N. Carson Street, Carson City, NV 89706.

26 **D'CARREY STELL**, 2711 Halcyon Time Trail, Houston, TX 77045.

27 **CINDY THOMAS**, c/o Sherri R. Carter, Executive Officer/Clerk, 111 N. Hill St., Rm. 105, Los
28 Angeles, CA 90012-3014.

1 TSOFTNET, INC., c/o Davine Henderson, LLC, 2533 N. Carson St., Carson City, NV 89076.
2 BARBARA VARGAS, c/o Sherri R. Carter, Executive Officer/Clerk, 111 N. Hill St., Rm. 105, Los
3 Angeles, CA 90012-3014.
4 ALEX VARONOS and aliases and DBAs, c/o Viewpartner Corporation's agent for service of
5 process: Laughlin Associates, Inc., 9120 Double Diamond Pkwy., Reno, NV, 89521.
6 VIEWPARTNER CORPORATION attn: ALEX VARONOS, President, Director, Secretary,
7 Treasurer c/o Laughlin Associates, Inc., 9120 Double Diamond Pkwy., Reno, NV, 89521.
8 EDWARD WALSH, 717 17th Street, Suite 1520, Denver, CO 80202.
9 JAMES MICHAEL WELCH, c/o Marsha Slough, Presiding Judge, 303 W. Third St., 4th Floor,
10 San Bernardino, CA 92415-0302.
11 WELLS FARGO BANK, LTD and all agents and Affiliates, c/o CSC-Lawyers Incorporating
12 Service, 2710 Gateway Oaks Dr., Ste. 150N, Sacramento, CA 95833.
13 WELLS FARGO BANK NATIONAL ASSOCIATION CALIFORNIA, c/o Corporation Service
14 Company, 2908 Poston Ave., Nashville, TN 37203-1312.
15 DAVID S. WESLEY, Presiding Judge of LASC, 111 N. Hill St., Los Angeles, CA 90012-3014.
16 LLOYD WESTBROOK, 450 S. Acacia Avenue, Apt. 2060, Mesa, AZ 85204.
17 KEITH G. WILEMAN, c/o Veatch Carlson, 700 S. Flower St., 22nd Floor, Los Angeles,
18 CA 90017-4209.
19 WORLD CUP COMEDY, LLC, c/o Wayne Page, 1066 Charles St., Pasadena, CA 91103.
20 CRAIG T. WORMLEY, 1109 Englewild Dr., Glendora, CA 91741.
21 XIAOYI YAO, 49 Sycamore Lane, Buena Park, CA 90621.
22 ZURICH IN NORTH AMERICA, 1400 American Lane, Tower 2, Floor 5, Schaumburg, IL 60196.
23 AMERICAN ZURICH INSURANCE CO., c/o CSC-Lawyers Incorporating Service, 2710
24 Gateway Oaks Drive, Ste. 150, N. Sacramento, CA 93833.
25 PLAINTIFFS:
26 Plaintiffs, RICHARD LEWIS in *pro per* and *ex rel.*, ("LEWIS"); LORRAINE K. LEWIS,
27 ("LORRAINE") RICHARD L. LEWIS III ("LEWIS III"), SCOTT E. LEWIS ("SCOTT"); MINOR
28 CHILD 1 ("MINOR 1"), MINOR CHILD 2 ("MINOR 2"), MINOR CHILD 3 ("MINOR 3"), and

1 MINOR CHILD 4 ("MINOR 4") (collectively "MINORS") NELLE ("NELLE"), THOMAS W.
2 PAEGEL ("THOMAS"), THOMAS W.V. PAEGEL ("TOMMY"), (collectively "PAEGELS"), THE
3 BODY COMPANY SPORTS, INC. ("TBCS"), file this Complaint and alleges against Defendants as
4 follows:

5 **DEFENDANTS:**

6 PETE E. ALMEIDA ("ALMEIDA"); AMERICAN EXPRESS TRAVEL RELATED SERVICES
7 COMPANY, INC., ("AEX" and all financial institutions collectively "FIN INST"); JEAN-RENE
8 BASLE ("BASLE"); BIBI BAC ("BAC"); BEVERLY HILLS POLICE DEPARTMENT
9 ("B.H.P.D."); WILLIAM BEATY ("BEATY"); CORBIN BLEU ("BLEU"); THOMAS JAMES
10 BORRIS ("BORRIS"); KENNETH G. CAMPION and DBA ("CAMPION"); CARMAX AUTO
11 SUPERSTORES, INC ("CARMAX"); HON. LISA HART COLE ("COLE"); LYDIA CORNELL
12 and all aliases and DBAs (collectively "CORNELL"); MEKI COX, and all aliases and DBAs:
13 (collectively "COX"); GEORGE DEL JUNCO and DBA (collectively "JUNCO"); ELIDA DEL
14 TORO and DBA (collectively "TORO"); LEE SMALLEY EDMON ("EDMON"); ESTARHD
15 ("eSTAR"); HANY FANGARY ("FANGARY"); FARMER'S INSURANCE COMPANY and all
16 DBAs ("FARMERS" and all insurers collectively "INS"); DAVID FLEMING ("FLEMING");
17 JAMES HILLIS FORD ("FORD"); JACK W. GOLDEN ("GOLDEN"); (ALLEN) KELSEY
18 GRAMMER and all DBAs; corporations, and limited liability companies (collectively
19 "GRAMMER"); ARTHUR HADDOCK ("HADDOCK"); RAYMOND HAIGHT, III ("HAIGHT");
20 PAUL HAYELAND and all aliases and DBAs: (collectively "HAYELAND"); IVAN JACKSON and
21 DBA TSOFTNET (collectively "JACKSON"); MARTHA KEHOE ("KEHOE"); CASEY KEITH
22 and DBA (collectively "KEITH"); S. MARTIN KELETI ("KELETI"); STEPHANIE M. KING and
23 all aliases and DBAs (collectively "KING"); JOHN KRATTI ("KRATTI"); MARYLAND
24 CASUALTY CO. ("MARYLAND" and all insurers collectively "INS") MASTERCARD
25 WORLDWIDE ("MC" and all financial institutions collectively "FIN INST"); MERITUS
26 PAYMENT SOLUTIONS ("MERITUS" and all financial institutions collectively "FIN INST");
27 ALLEN S. MILLER and all aliases and DBAs: (collectively "MILLER"); THE MILNER GROUP,
28 LLC ("MILNER"); PHILLIP MULLIGAN and DBA TSOFTNET, collectively "MULLIGAN");

1 ROBERT MELVIN NEWELL, JR. ("NEWELL"); BARBARA NIVEN ("NIVEN"); JAN A. PLUIM
2 ("PLUIM"); JAMES D. ROBERTS ("ROBERTS"); DAVID M. ROBINSON, and all DBAs
3 ("ROBINSON"); MARK SCHWARTZ ("SCHWARTZ"); RANDALL J. SHERMAN
4 ("SHERMAN"); GENE SIMMONS and all aliases and DBAs: ("SIMMONS"); MARSHA SLOUGH
5 ("SLOUGH"); STAROPOLY, LLC ("STAROPOLY"); D'CARREY STELL ("STELL"); CINDY
6 THOMAS ("THOMAS"); TSOFTNET, INC ("TSOFTNET"); TODHD ("TODHD"); BARBARA
7 VARGAS ("VARGAS"); ALEX VARONOS and all aliases, DBAs, corporations, and limited
8 liability companies ("VARONOS"); VIEWPARTNER CORPORATION ("VIEWPARTNER");
9 EDWARD WALSH, Esq. ("WALSH"); MICHAEL WELCH "(WELCH"); WELLS FARGO N.A.
10 and all agents and Affiliates, ("FARGO" and all financial institutions collectively "FIN INST");
11 DAVID S. WESLEY ("WESLEY"); LLOYD WESTBROOK ("WESTBROOK"); KEITH G.
12 WILEMAN ("WILEMAN"); CRAIG T. WORMLEY and DBAs (collectively "WORMLEY");
13 XIAOYI YAO ("YAO"); ZURICH INSURANCE, N.A. and Agents, Affiliates, and Subsidiaries
14 ("ZURICH" and all insurers collectively "INS").

15 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS**
16 **OF RECORD:**

17 Now comes Richard LEWIS, Plaintiff in *propria persona* and *ex rel.* for the people of the
18 United States of America and the Citizens of Tennessee as Private Attorney General under the Civil
19 RICO Act 18 USC §1961-1968 and particularly 18 USC § 1964 - Civil remedies including Sections
20 1962 (a), (b), (c), and (d); The HOBBS Act §1958; 18 USC §201; JUDICIAL CANONS 1-3;
21 Racketeer Influenced and Corrupt Organizations Act of 1970; the Tennessee Civil RICO Act;
22 Tennessee RICO act; Tennessee GANG BILL; Money laundering 18 U.S.C. § 1956; Americans with
23 Disabilities Act of 1990, 42 U.S.C. § 12102; U.S.A. Patriot Act; Homeland Security Act; Elder
24 Abuse Laws; The Adam Walsh Child Protection and Safety Act of 2006; and statute 42 U.S.C.
25 §1983 that provides a federal remedy for the violation of federally protected rights (collectively the
26 "ACTS"), the Tennessee Terrorism Prevention Act, and Tennessee statutory and common law.

27 This case arises in part as a direct result of certain Defendants impeding LEWIS'S prior
28 investigations of RICO violations.

COMPLAINT

Page 13

1 “[A] ‘racketeering investigation’ means any inquiry conducted by any
2 racketeering investigator for the purpose of ascertaining whether **any**
3 **person** has been involved in any violation of this chapter or of any final
4 order, judgment, or decree of any court of the United States, duly
5 entered in any case or proceeding arising under this chapter.”

6 18 U.S.C. § 1961(8). [Bold emphasis added]

7 On May 7, 2012, LEWIS was added as a plaintiff in California superior court case number
8 GC047909 and subsequently submitted a Supplement (herein submitted as EXHIBIT 1) on August 6,
9 2012, which expressly asserted his intent to investigate RICO violations as authorized by the Civil
10 RICO Act as the private attorney general. LEWIS’S efforts in that case were impeded by certain
11 Defendants in this case, which includes thirty-five (35) causes of action and a growing number of
12 Defendants who have each committed and continue to commit multiple violations of the RICO Act
13 and other federal acts including, but not limited to: child endangerment, judicial racketeering, money
14 laundering, tax fraud and evasion, corruption, collusion, conspiracy, perjury, bad faith, violations of
15 fiduciary duties, mail tampering, mailbox tampering, interstate transportation of stolen property,
16 internet fraud and piracy, theft, bribery, graft, conflicts of interest, extortion, blackmail, grand
17 larceny, stalking, harassment, defamation, death threats, mail fraud, wire fraud, violations of due
18 process, and the common laws of the United States of America, Tennessee, California, and Florida.

19 Under Section 1962(c), the RICO “person” and the RICO “enterprise” cannot be one and the
20 same, however under Sections 1962(a) and (b), “enterprise” and “person” may be the same and need
21 not be separate and distinct. *In re Burzynski*, 989 F.2d 733 (5th Cir.1993); *Landry v. Air Line Pilots
22 Association, et al.*, 901 F.2d 404 (5th Cir.1990). See also, *Liquid Air Corporation v. Rogers, et al.*,
23 834 F.2d 1297 (7th Cir.1987); *Petro-Tech, Inc. v. The Western Company of North America*, 824 F.2d
24 1349 (3d Cir.1987); *Haroco v. American National Bank and Trust Company of Chicago, et al.*, 747
25 F.2d 384 (7th Cir.1984); *Bowman v. Western Auto Supply Company, et al.*, 773 F.Supp. 174
26 (W.D.Mo.1991); *Harrison v. Dean Witter Reynolds, Inc., et al.*, 695 F.Supp. 959 (N.D.Ill.1988).

27 “(a) It shall be unlawful for any person who has received any income
28 derived, directly or indirectly, from a pattern of racketeering activity or
 through collection of an unlawful debt in which such person has
 participated as a principal within the meaning of section 2, title 18,
 United States Code, to use or invest, directly or indirectly, any part of
 such income, or the proceeds of such income, in acquisition of any

1 interest in, or the establishment or operation of, any enterprise which is
2 engaged in, or the activities of which affect, interstate or foreign
3 commerce. A purchase of securities on the open market for purposes of
4 investment, and without the intention of controlling or participating in
5 the control of the issuer, or of assisting another to do so, shall not be
6 unlawful under this subsection if the securities of the issuer held by the
7 purchaser, the members of his immediate family, and his or their
8 accomplices in any pattern or racketeering activity or the collection of an
9 unlawful debt after such purchase do not amount in the aggregate to one
10 percent of the outstanding securities of any one class, and do not confer,
11 either in law or in fact, the power to elect one or more directors of the
12 issuer.

13 (b) It shall be unlawful for any person through a pattern of racketeering
14 activity or through collection of an unlawful debt to acquire or maintain,
15 directly or indirectly, any interest in or control of any enterprise which is
16 engaged in, or the activities of which affect, interstate or foreign
17 commerce.

18 (c) It shall be unlawful for any person employed by or associated with
19 any enterprise engaged in, or the activities of which affect, interstate or
20 foreign commerce, to conduct or participate, directly or indirectly, in the
21 conduct of such enterprise's affairs through a pattern of racketeering
22 activity or collection of unlawful debt.

23 (d) It shall be unlawful for any person to conspire to violate any of the
24 provisions of subsection (a), (b), or (c) of this section."

25 18 U.S.C. Section 1962 (a)-(d).

26 ORIGINAL JURISDICTION

27 This case falls under the jurisdiction of the federal statutes and the state of Tennessee, which
28 includes the county of Union, with original jurisdiction. The State of Tennessee, Union County
shall have original jurisdiction to prevent and restrain violations of section 1962 of the Civil RICO
Act and the (ACTS) by issuing appropriate orders, including, but not limited to: 1) Ordering any
person to divest himself of any interest, direct or indirect, in any enterprise, 2) Imposing reasonable
restrictions on the future activities or investments of any person, including, but not limited to,
prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in, the
activities of which affect interstate or foreign commerce, and/or 3) Ordering dissolution or
reorganization of any enterprise, making due provision for the rights of innocent persons.

29 //

30 //

RACKETEERING AND ORGANIZED CRIME—CIVIL RICO

General Provisions

RICO, 18 U. S. C. §§1961-1968 (1994 ed. and Supp. III) (Racketeering Influence and Corrupt Organization) makes it criminal "to conduct" an "enterprise's affairs through a pattern of **racketeering activity**," 18 U. S. C. §1962(c), defined as behavior that violates certain other laws, either enumerated federal statutes or state laws addressing specified topics and bearing specified penalties, 18 U. S. C. §1961(1) (Supp. III). "Pattern" is also a defined term requiring "at least two acts of racketeering activity . . . the last of which occurred within ten years . . . after the commission of a prior act of racketeering activity." 18 U. S. C. §1961(5).

Civil RICO specifically has a purpose of *encouraging* potential private plaintiffs to investigate diligently. *Rotella v. Wood*, 528 U.S. 549 (2000). [Emphasis added.] The Civil RICO Acts contain **no express limitations** for civil enforcement actions. (Clayton Act analogy, §4b, as added, 69 Stat. 283, 15 U. S. C. §15b, See, e.g., *Grimmett v. Brown*, 75 F. 3d 506, 511 (CA9 1996); *McCool v. Strata Oil Co.*, 972 F. 2d 1452, 1454-1465 (CA7 1992); *Rodriguez v. Banco Central Corp.*, 917 F. 2d 664, 665-666 (CA1 1990); *Bankers Trust Co. v. Rhoades*, 859 F. 2d 1096, 1102 (CA2 1988); *Pocahontas Supreme Coal Co. v. Bethlehem Steel Corp.*, 828 F. 2d 211, 220 (CA4 1987)).

The administrative director of the courts is authorized to establish any policies and procedures that may be necessary to assist courts with compliance with the Americans with Disabilities Act, 42 U.S.C. § 12131 *et. seq.* T.C.A. §16-3-803. The Supreme Court shall approve any such policies and procedures prior to implementation. Participants in the judicial system shall comply with any policies and procedures that may be implemented. This rule shall apply to all courts in this state, including without limitation, municipal courts, general sessions courts, juvenile courts, circuit courts, chancery courts, criminal courts, and the respective appellate courts. *Id.*

Hobbs Act

The Hobbs Act, 18 USC § 1951 governs the interference with commerce by threats or violence. It is described in RICO itself, 18 U.S.C. § 1961(1)(A).

113

1 **Judicial Racketeering**

2 The California Judicial System has received inordinate attention in recent years for
3 corruption. Furthermore, U.S. attorneys and courts have protected participants by thwarting appeals.
4 According to former U. S. Prosecutor **Richard I. Fine, Ph.D.**, ninety percent (90%) of California
5 judges actively participate in on-going racketeering. On August 13, 2013 California parents brought
6 RICO charges against San Diego, CA judges.

7 ARTICLE ENTITLED: "10-10-01 United Nations Human
8 Rights Council Records for 2010 Review (UPR) of
9 Human Rights in the United States - referring
to "corruption of the courts and the legal
profession" in California."

10 "Human Rights Alert's report pertaining to **corruption of the courts, the legal profession, and law enforcement in Los Angeles County, California**, was noted by the United Nations Los Angeles, October 2 - Human Rights Alert (NGO), a young organization, with no resources at all, got a mention and a reference in the report staff report of the Human Rights Council (HRC) of the United Nations, [1] as part of the Universal Periodic Review (UPR) of Human Rights in the United States. Page 8: HRAalert referred to **corruption in the courts and the legal profession, and discrimination of US law enforcement in California**. 69 Notes: 69 HRAalert pages 1-5. See submission for cases cited. The evidence provided by Human Rights Alert pertained to large-scale false imprisonment at the criminal courts, and real estate fraud in collusion with large financial institutions and law-firms at the civil courts. The HRC report reference was somewhat cryptic regarding "discrimination of US law enforcement in California." It pertained to allegations in the Human Rights Alert report of discrimination by law enforcement against Los Angeles County, California, for at least two decades, through **refusal of US law enforcement to address overwhelming evidence of racketeering by judges of the Los Angeles Superior Court**. Discrimination against a region of the country is a violation of Human Rights, in and of itself. The Human Rights Alert report to the United Nations provided evidence of such discrimination through conduct of KENNETH KAISER -FBI Assistant Director for Criminal Investigations, and KENNETH MELSON - former Director of US Department of Justice Office of US Attorneys. The report also provided **evidence of patronizing of the conduct of the Los Angeles Superior Court by the United States courts - National Tribunals for Protection of Rights pursuant to the Universal Declaration of Human Rights - from the US District Court, Central District of California, through the US Court of Appeals, 9th**

Circuit, to the Supreme Court of the United States. Much larger organizations, and even Joint Reports of consortia of organizations got no mention at all. The HRC report was issued as part of the UPR process, established by the General Assembly of the United Nations in 2006. In April 2010, over 100 organizations filed reports as "stakeholders" as part of the review process. In August 2010 the US State Department filed its response. Albeit, the State Department report simply ignored the reports of stakeholders and the HRC staff, and was largely self-congratulatory. Review session regarding Human Rights in the United States is scheduled for November 5, 2010 in Geneva. **Human Rights Alert (NGO)** is dedicated to discovering, archiving, and disseminating evidence of Human Rights violations by the justice systems of the State of California and the United States in Los Angeles, California, and beyond. Special emphasis is given to the unique role of computerized case management systems in the precipitous deterioration of integrity of the justice system. LINKS [1] 10-01-10 United Nations Human Rights Council Records for 2010 Review (UPR) of Human Rights in the United States <http://www.scribd.com/doc/38566837/>

Published by: Human Rights Alert, NGO on Oct 02, 2010. [Bold emphasis added]

Plaintiffs anticipate that many of the 300 DOE Plaintiffs will enter this suit based solely upon instances of judicial racketeering. Owing to the widespread corruption of courts located in California, it has become futile to expect justice there.

Statute of Limitations

A cause of action brought under the Civil RICO Act must be brought within four years of the predicate act giving rise to the “complaint,” however, the statute of limitations for a defendant’s liability extends to the previous ten years. All of Plaintiffs’ original causes of action are being brought well within the four year statute of limitations. However, LEWIS fully intends to investigate Defendants’ activities for the full ten year period as authorized by the Act. In fact, the statutes require that LEWIS engage in aggressive discovery and report his findings to the appropriate authority (ies) for criminal prosecution.

Private Attorney General

The Private Attorney General is authorized under the Civil RICO Act to investigate under this section and report his findings to the proper authorities for any and all criminal actions they may take. Pending final determination thereof, the court may at any time enter such restraining orders or

1 prohibitions, or take such other actions, including the acceptance of satisfactory performance bonds,
2 as it shall deem proper.

3 **Damages, Cost of Suit, Attorney Fees**

4 “Any person injured in his business or property by reason of a violation of section 1962 of
5 this chapter may sue therefore in any appropriate United States district court or the State of
6 Tennessee—which has original jurisdiction thereof—and **shall recover threefold the damages s/he**
7 **sustains and the cost of the suit, including a reasonable attorney’s fee**, except that no person may
8 rely upon any conduct that would have been actionable as fraud in the purchase or sale of securities
9 to establish a violation of section 1962. The exception contained in the preceding sentence does not
10 apply to an action against any person that is criminally convicted in connection with the fraud, in
11 which case the statute of limitations shall start to run on the date on which the conviction becomes
12 final.” See Tennessee RICO Statute 1989; Applied to TN “Gangs Act” Jan. 23, 2012; Ch. 3917 1981;
13 18 U.S.C. § 1962, *et seq.*

14 **Subsequent Actions and Jurisdiction**

15 A final judgment or decree rendered in favor of the United States and the State of Tennessee
16 in any criminal or civil proceeding brought by the Private Attorney General shall estop the defendant
17 from denying the essential allegations of the criminal or civil offense in any subsequent proceeding
18 brought by the United States. 18 U.S.C. § 1964(d).

19 Civil RICO statutes are supplemented by 2 Human Rights Treaties—the Universal
20 Declaration of Human Rights and the International Covenant on Civil and Political Rights—both of
21 which are rendered supreme law by virtue of the Supremacy Clause (similar to the Bill of Rights).

22 The latter Covenant’s Reservations enacted by Congress expressly reserve original
23 jurisdiction to State and local governments, to the end that their competent authorities may take
24 appropriate measures for the fulfillment of the Covenant.

25 **TENNESSEE TERRORISM PREVENTION AND RESPONSE ACT 2010 TN. CODE, TITLE**
26 **39, CHAPTER 13, OFFENSES AGAINST PERSON PART EIGHT, TERRORISM**
27 **PREVENTION AND RESPONSE ACT OF 2002.) 39-13-805 COMMISSION OF AN ACT OF**
TERRORISM (TERRORISM PREVENTION AND RESPONSE ACTS OF 2002 CH. 849,1

1 It is an offense for any person to commit any act of terrorism in Tennessee. An act of
2 terrorism is a class "A" felony. Tennessee has become the first state to fight terrorism statewide.
3 Until now, Tennessee was the first terrorist-free state in the nation. Under the transportation security
4 administration, Tennessee is the first state to deploy the visible intermodal prevention and response
5 (VIPR) counter-terrorism act known as the Tennessee Terrorism Prevention and Response Act, which
6 has direct authority for and protection from terrorism-related events.

7 The Tennessee office of homeland security has a primary responsibility and authority for
8 directing statewide activities pertaining to the prevention of and protection from terrorist-related
9 events. This responsibility includes the development and implementation of a comprehensive and
10 coordinated strategy to secure the state from terrorist threats and acts. Further, the office of
11 homeland security serves as a liaison between federal, state, and local agencies and private sector on
12 matters relating to the security of the state of Tennessee and its citizens.

13 **LEWIS AS PRIVATE ATTORNEY GENERAL**

14 Under 18 USC § 1964(c), a Private Attorney General ("PAG") may appear in court
15 without the license to practice law that is required of all State Bar members. The State of
16 Tennessee and the Superior Court of Union Tennessee has jurisdiction under 18 USC 1964(c), which
17 Congress passed to enable any person who has been injured by a Civil RICO Act violation to sue.
18 That person can request an order for damages and injunctions (such as a restraining order). Under his
19 authority as the Private Attorney General, Plaintiff LEWIS in *propria persona* and as *ex rel* is also
20 requesting a restraining order against all defendants at this time, to prevent future violations. The
21 ACTS provide that the plaintiff can recover *treble* damages, expenses, attorney fees, and costs;
22 LEWIS herein requests same at a minimum as well as exemplary/punitive damages in order to
23 discourage these Defendants and parties similarly so situated. Furthermore, The ACTS provide
24 that the plaintiff must submit all findings of fact and discovery to the appropriate legal authority (ies)
25 for prosecution.

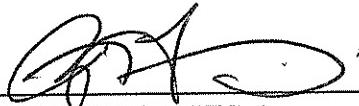
26 This case is a perfect example of how obstruction of justice and acts that could be
27 categorized as "domestic terrorism" are perpetrated by and through organized crime.
28 Appropriate local and federal agencies are actively investigating certain defendants. Amongst the

1 Defendants herein are members of the judiciary in the states of Florida and California who *ignored*
2 *federal, state, and local rules and provisions of the United States Constitution* in order to make
3 biased and unsupportable rulings in favor of criminal acts by Defendants in cases GC047909, 11-CV-
4 08810GW(SHx), PROPS0700007, 30-2012-00609008-PR-TR-CJC, 30-2012-00609235-PR-TR-CJC,
5 SS022572, PAS 11S00624 in several California courts and 11S00624ca in Florida family court.
6 Exhibits 1-92 include documents from hearings in cases presided over by defendants that are
7 members of the judiciary.

8 All statements are being made under penalty of perjury according to my information and
9 belief.

10 DATED:

SUBMITTED BY:



11 RICHARD LEWIS, *in propria persona and ex rel* as a
12 Private Attorney General for Plaintiffs RICHARD
13 LEWIS, RICHARD LEWIS III; LORRAINE LEWIS,
SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W.
PAEGEL; NELLE S. PAEGEL; THOMAS W.V.
PAEGEL; THE BODY COMPANY SPORTS, INC.

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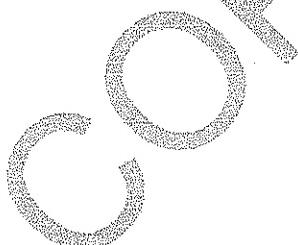
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STATEMENT OF ACTION

Request for Judicial Notice

This matter arises out of pre-litigation and litigation occurrences from twelve prior cases in Tennessee, Florida, Arizona and California. Plaintiffs request this Court take Judicial Notice of the transcripts and files of the following case numbers: 13875, 13899, 13895 (Tennessee) GC047909, 11-CV-08810GW(SHx), PROPS0700007, 30-2012-00609008-PR-TR-CJC, 30-2012-00609235-PR-TR-CJC, SS022572, 11S00624, BC495150, PAS 11S00624 (California) and 12001807ca (Florida) showing *inter alia* how many of the Defendants endangered children, abused adults, harassed the elderly, financially abused the elderly, submitted to courts corrupted records and documents, perjury, misrepresentations to the Courts, manufactured evidence, persecuted Plaintiffs and their families, stalked and threatened.

Owing to the complex nature of the allegations and intertwining of parties, LEWIS requests that this case be categorized as “complex” and as such requests this Court initiate and implement efficient supervision and control of the litigation proceedings from the beginning of the process to ensure a fair resolution of the complex litigation issues before it.

Request for Fingerprinting

Due to prior experiences with many of the Defendants are prone to frivolous filings, clogging courts, and twisting facts and law. As a result, LEWIS requests an order to have all Defendant individuals AND their counsel fingerprinted by the Maynardville Sheriff no later than one week prior to submitting any response or "answer." This request is considered *essential* to this litigation process as true identities are unknown. Each individual must also bring a valid form of photo identification and certified birth certificate.

All statements are being made under penalty of perjury according to information and belief.

DATED: _____ SUBMITTED BY: _____

RICHARD LEWIS, *in propria persona* and *ex rel* as a Private Attorney General for Plaintiffs RICHARD LEWIS, RICHARD LEWIS III; LORRAINE LEWIS, SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W. PAEGEL; NELLE S. PAEGEL; THOMAS W.V. PAEGEL; THE BODY COMPANY SPORTS, INC.

1
2 Plaintiffs herein named and DOES 1-300 inclusive allege as follows:

3 GENERAL ALLEGATIONS

- 4 1. LEWIS is informed and believes that Defendants intertwined and correlated their
5 activities into three common criminal schemes" in order to defraud Plaintiffs and the public at
6 large; these schemes are herein delineated as: "Criminal Scheme 'A,'" "Criminal Scheme
7 'B,'" and "Criminal Scheme 'C.'"
8 2. LEWIS is informed and believes that Criminal Scheme "A" consists of the underlying
9 fraudulent common plans and schemes used by certain of the Defendants to defraud the
10 Plaintiffs and the public at large via mass marketing and internet fraud.
11 3. LEWIS is informed and believes that Criminal Scheme "B" consists of conspiracies
12 through a common plan and actions by certain Defendants who obstructed justice by
13 committing fraud upon the court and the plaintiffs.
14 4. LEWIS is informed and believes that Criminal Scheme "C" consisted of conspiracies
15 through a common plan by many
16 Defendants to obstruct justice by so harassing Plaintiffs as to coerce Plaintiffs into stop
17 seeking their legal remedies through judicial processes.
18 5. LEWIS is informed and believes that various Defendants and their actions were
19 intertwined between Criminal Schemes A, B, and C, each of which is delineated and
20 identified by the appropriate cause(s) of action.
21 6. LEWIS is informed and believes, and based herein alleges, Defendants, and each of
22 them, were agents, servants, representatives, and/or employees of one or more other
23 Defendant(s) herein named.
24 7. LEWIS is informed and believes, and based herein alleges, that CORNELL, COX,
25 HAYELAND, KEITH, KING, MILLER, VARONOS, FLEMING, JACKSON, KEHOE,
26 MULLIGAN, ROBINSON, SIMMONS, and WORMLEY regularly conducted business
27 through internet websites that were not registered or legitimate in order to avoid taxation and
28 other liabilities in order to further their common plan(s) and/or schemes.

- 1 8. LEWIS is informed and believes, and based herein alleges, that the Defendants were
2 interrelated in one or more ways; that there was a distinct correlation between each of the
3 Defendants and at least one other Defendant.
- 4 9. LEWIS is informed and believes, and herein alleges, that Defendants actively
5 participated in on-going and evolving Criminal Schemes involving two or more predicate acts
6 by individuals and enterprises including, but not limited to members of: 1. The world-wide
7 banking industry, 2. the world-wide insurance industry, 3. the legal profession, 4. law
8 enforcement agencies, and 5. the California State Court System all of which have violated one
9 or more of the ACTS.
- 10 10. LEWIS is informed and believes, and herein alleges that many Defendants conspired
11 to impede an ongoing Civil RICO investigation.
- 12 11. LEWIS is and at all times mentioned herein, a citizen of the United States and resident
13 of Union County, Tennessee.
- 14 12. LEWIS is informed and believes that LEWIS is the father of LEWIS III, SCOTT and
15 LORRAINE.
- 16 13. LEWIS is informed and believes that LEWIS is the Grandfather of MINORS 1, 2, 3,
17 and 4.
- 18 14. LEWIS is informed and believes that LORRAINE is at all times mentioned herein a
19 citizen of the United States and resident of Charlotte County Florida and is the mother
20 MINORS 1 and 2.
- 21 15. LEWIS is informed and believes that LORRAINE and MINORS 1 and 2 visited
22 LEWIS at his home.
- 23 16. LEWIS is informed and believes that LEWIS III is at all times mentioned herein a
24 resident of Charlotte County, Florida and is the father of MINORS 3 and 4.
- 25 17. LEWIS is informed and believes that LEWIS III and MINORS 3 and 4 visited LEWIS
26 at his home.
- 27 18. LEWIS is informed and believes that MINORS 1, 2, 3, and 4, were at all times
28 mentioned herein citizens and residents of the United States, however their current addresses

1 are under protection due to their ages.

2 19. LEWIS is informed and believes that The PAEGELS were and at all times mentioned
3 herein residents of Los Angeles County, California and principals of TBCS.

4 20. LEWIS is informed and believes that TBCS is the Body Company Sports, Inc. and
5 was at all times mentioned herein, a Nevada corporation with its principle place of business in
6 Los Angeles County, California.

7 21. LEWIS is informed and believes that NELLE was the attorney of record for plaintiffs
8 in the Los Angeles Superior Court Cases discussed *supra*.

9 22. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
10 that Defendant VARONOS was a principle and main force behind the illegal acts of
11 VIEWPARTNER, TSOFTNET, STAROPOLY, TODHD, and eSTAR.TV, all of which have
12 conducted business in multiple states of the U.S. and via the internet.

13 23. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
14 Defendants TORO and JUNCO misrepresented themselves as married to each other, were
15 residents of Los Angeles County, California, and are the owners and operators of GREEN.

16 24. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
17 Defendant CORNELL was an individual and resident of Los Angeles County, California and
18 is the operator of the fraudulent "businesses" known as: LCE; GODSHOTS™LLC.;
19 GODSHOTS.ORG; RECOVERY GODSHOTS; MILITARY GODSHOTS; LC
20 ENTERTAINMENT GROUP; VENUS FILMS AND PRODUCTIONS and LYDIA
21 CORNELL KORNILOFF VENUS FILMS AND PRODUCTONS that are used to sell
22 products, gather donations, rent rooms in her home, and steal money and property without
23 paying taxes on the income.

24 25. LEWIS is informed and believes that CORNELL misrepresented GODSHOTS
25 TML.L.C., RECOVERY GODSHOTS and MILITARY GODSHOTS to be charities.

26 26. LEWIS is informed and believes that HAYELAND was CORNELL'S husband and
27 business partner.

28 27. LEWIS is informed and believes that HAYELAND fraudulently operated(s) GSAXE,

1 AXE LTD., GODSHOTS.TV, and SPORTS ICON ENTERTAINMENT.

2 28. LEWIS is informed and believes that CORNELL signed her name as a witness to the
3 will of Virginia J. Nicklins, prior to her marriage to HAYELAND.

4 29. LEWIS is informed and believes that HAYELAND was the executor of the Virginia J.
5 Nicklins estate prior to his marriage to CORNELL.

6 30. LEWIS is informed and believes that CORNELL and HAYELAND were investigated
7 for fraud on the Virginia Nicklins estate in 2006 as husband and wife; they are now divorced.

8 31. LEWIS is informed and believes that CORNELL and HAYELAND operated SIE and
9 LCE.

10 32. LEWIS is informed and believes that HAYELAND was an employee of SIMMONS.

11 33. LEWIS is informed and believes that SIMMONS sells his likeness and products on
12 GSAXE and AXE LTD.

13 34. LEWIS is informed and believes that HAYELAND sold SIMMONS'S the internet via
14 the SIE website.

15 35. LEWIS is informed and believes that neither GSAXE nor AXE LTD were organized
16 or licensed businesses.

17 36. LEWIS is informed and believes that SIE was not an organized or licensed business.

18 37. LCE was not an organized or licensed business.

19 38. LEWIS is informed and believes that LEWIS is informed and believes that FIN INST
20 were regulated by federal law and the banking industry.

21 39. LEWIS is informed and believes that BEATY was an agent of the FIN INST. known
22 as MERITUS.

23 40. LEWIS is informed and believes that KEHOE was at all times mentioned herein a
24 resident of Charlotte County, Florida

25 41. LEWIS is informed and believes that FORD was a personal friend of CORNELL.

26 42. LEWIS is informed and believes that WALSH was a personal friend of CORNELL.

27 43. LEWIS is informed and believes that WALSH met, threatened and defamed LEWIS
28 via the internet.

44. LEWIS is informed and believes that ROBERTS was a licensed California attorney at law.

45. LEWIS is informed and believes that HADDOCK was a personal friend of KEHOE, the father of MINORS 1 and 2, and ex-husband of LORRAINE.

46. LEWIS is informed and believes that NIVEN, MILLER and KING were business partners who sold services and products over the internet and at unlicensed California locations without paying taxes.

47. LEWIS is informed and believes that FLEMING introduced MILLER as a business partner and public relations "expert" despite that MILLER has no skills in public relations.

48. LEWIS is informed and believes that MILLER represented himself as a public relations "expert" and sold his services through HITMANPR, hitmanpr.com, and/or HITMAN PUBLIC RELATIONS none of which was registered, licensed, or organized.

49. MILLER advertised HITMANPR on his internet website hitmanpr.com and in person.

50. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein that TODHD, STAROPOLY, and ESTAR TV were never legitimate business ventures, but rather devised by VARONOS, FLEMING, GRAMMER, BLEU, CORNELL, ROBINSON, WORMLEY, JUNCO, TORO, KING and MILLER for the express purpose of furthering the goals and objectives of Criminal Schemes.

51. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein MILLER and KING lived together as residents of Monrovia in Los Angeles County, California.

52. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein MILLER and KING were partners in multiple Criminal Schemes.

53. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein that KING was a licensed and practicing chiropractor in the city of San Marino and a member of the TODHD Criminal Scheme.

54. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein FLEMING was a resident of Los Angeles County, California and was a partner of

1 VARONOS, JACKSON, MULLIGAN, MILLER, KING, and GRAMMER.

2 55. GRAMMER, VARONOS and FLEMING created TODHD, STAROPOLY, and
3 ESTAR websites that portrayed multiple fake "businesses ventures" which were used to
4 defraud targeted individuals and the public at large and acquire funds "tax free."

5 56. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
6 ROBINSON was a resident of Los Angeles County, California; President of Defendant
7 MILNER; a business partner of WORMLEY; a disbarred California attorney; an agent of
8 Defendants VARONOS, FLEMING, JUNCO, TORO, MILLER, GRAMMER, KING; and
9 member of the Criminal Scheme.

10 57. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
11 Defendant WORMLEY was a resident of Los Angeles County, California, a suspended
12 California attorney; and a partner of JUNCO, TORO, ROBINSON, VARONOS and
13 FLEMING.

14 58. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
15 that KING, MILLER, VARONOS, FLEMING, GRAMMER, BLEU, CORNELL,
16 ROBINSON, WORMLEY, JUNCO, TORO, HAYELAND, SIMMONS, KEHOE,
17 JACKSON, MULLIGAN, FIN INST, and INS colluded to defraud their "victims" through the
18 internet via fake companies and false identities as part of a Criminal Scheme.

19 59. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
20 that EXP was a FIN INST in collusion with VARONOS, FLEMING, GRAMMER,
21 MERITUS, BEATY, FARGO and MC to commit credit card fraud as a member of that
22 Criminal Scheme.

23 60. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
24 Defendant BEATY was a resident of Orange County, California.

25 61. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
26 Defendant FARGO was a global FIN INST.

27 62. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
28 Defendant MC was a FIN INST located in New York, New York.

1 63. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
2 Defendant ZURICH was an insurer doing business in North America by and through itself,
3 FARMERS and MARYLAND.

4 64. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
5 GRAMMER was a resident of Los Angeles County, California and/or Chicago, Illinois and
6 owner of all GRAMMER companies.

7 65. LEWIS is informed and believes that FIN INST and BEATY conspired with
8 VARONOS, FLEMING, KING, MILLER, JUNCO, TORO, HAYELAND, SIMMONS,
9 ROBINSON, WORMLEY, MILNER, CORNELL, JACKSON, and MULLIGAN to receive
10 funds from defrauded victims and knowingly participated in credit card fraud and money
11 laundering.

12 66. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
13 STELL, CAMPION, WELCH, and HAIGHT colluded to cover up STELL'S interstate
14 transportation of stolen property, breach of contract, breach of fiduciary duty, violations of
15 numerous state and federal laws including, but not limited to, perjury.

16 67. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
17 that FANGARY colluded with SHERMAN to cover up violations of discovery, mail
18 tampering, mailbox tampering, harassment, perjury.

19 68. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
20 JUNCO and TORO were agents and owners of GREEN, a fraudulent business.

21 69. LEWIS is informed and believes, and herein alleges, that CORNELL, VARONOS,
22 MILLER, WILEMAN, KELETI, FLEMING, ROBINSON, WORMLEY, KING, TORO, and
23 JUNCO received "judicial protection" from EDMON, WESLEY, KRATII, PLUIM,
24 THOMAS, and VARGAS as members of Criminal Schemes.

25 70. LEWIS is informed and believes that FANGARY received "judicial protection" from
26 BORRIS, GOLDEN and SHERMAN as members of Criminal Schemes.

27 71. LEWIS is informed and believes that STELL and CAMPION received "judicial
28 protection" from SLOUGH, BASLE, HAIGHT, and WELCH as members of Criminal

1 Schemes.

2 72. LEWIS is informed and believes that CARMAX and FARGO conspired to falsely
3 claim that LEWIS stole his automobile in order to obtain a mug shot of LEWIS available on
4 the internet.

5 73. LEWIS is informed and believes that CORNELL received "judicial protection" from
6 WESLEY, KRATTI, and COLE as members of Criminal Schemes.

7 74. LEWIS is informed and believes that HADDOCK received "mediator protection"
8 from BAC as members of Criminal Schemes.

9 75. LEWIS is informed and believes, and herein alleges, that SCHWARTZ, CORNELL
10 and B.H.P.D. colluded to invade NELLE'S privacy in order to defame LEWIS.

11 76. LEWIS is informed and believes, and herein alleges, that WESLEY, EDMON,
12 SLOUGH, BORRIS, BASLE, GOLDEN and KRATTI colluded to ignore widespread
13 misapplication of the law by HAIGHT, PLUIM, SHERMAN, COLE, and WELCH in
14 furtherance of Criminal Schemes.

15 77. LEWIS is informed and believes, and herein alleges, that each and every Defendant
16 colluded with one or more other Defendant in one or more Criminal Schemes to defraud
17 Plaintiffs and the public using threats, coercion, harassment, bribery, defamation, and
18 personal or familial attacks on a global scale.

19 78. LEWIS is informed and believes, and herein alleges, that CORNELL, COX, MILLER,
20 HADDOCK, KEHOE, KEITH, VARONOS, FLEMING, WILEMAN, KING, GRAMMER,
21 PLUIM, THOMAS, VARGAS, TORO and JUNCO conspired to and/or hacked into one or
22 more Plaintiffs' computers and government databases.

23 79. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
24 CORNELL, COX, MILLER, HADDOCK, KING, BLEU, FIN INST, INS, PLUIM,
25 THOMAS, VARGAS, WILEMAN, WILEMAN, KELETI, NEWELL, YAO, KEHOE,
26 WESTBROOK, GRAMMER, ROBERTS, TORO, WALSH, FORD, ROBERTS,
27 ROBINSON, WORMNEY, VARONOS, FLEMING, JUNCO, FANGARY, and SHERMAN
28 conspired to defame, interfere with, defraud, extort, blackmail, threaten, harass, stalk, hack,

1 and steal from one or more Plaintiffs.

2 80. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
3 CORNELL, COX, MILLER, HADDOCK, HAYELAND, KING, COLE, PLUIM, THOMAS,
4 VARGAS, WILEMAN, GRAMMER, WALSH, FORD, KELETI, ROBERTS, VARONOS,
5 FLEMING, TORO, WESTBROOK, KEHOE, INS, FIN INST, and JUNCO conspired to
6 impede LEWIS'S investigations as PAG.

7 81. LEWIS is informed and believes, and herein alleges, that at all times mentioned herein
8 NEWELL was the attorney of record for KING who never withdrew from her representation.

9 82. LEWIS is informed and believes, and herein alleges, that at all times mentioned
10 herein NEWELL conspired with KING, WILEMAN, YAO, MILLER, PLUIM, THOMAS,
11 VARGAS, ROBINSON, and INS in furtherance of one or more Criminal Schemes to commit
12 illegal acts in defense of KING.

13 83. The true names and capacities, whether individual, corporate, associate, representative
14 or otherwise, of the Plaintiffs identified herein as DOES 1-300, inclusive, are currently
15 unknown to Plaintiffs, who therefore represents them by said fictitious names. LEWIS will
16 amend this complaint to allege the true names and capacities of Plaintiff DOES 1-300 who
17 will have same or similar complaints against related defendants.

18 84. The true names and capacities, whether individual, corporate, associate, representative
19 or otherwise, of the Defendants identified herein as DOES 1-300, inclusive, are currently
20 unknown to Plaintiffs, who therefore represents them by said fictitious names. LEWIS will
21 amend this complaint to allege the true names and capacities of Defendant DOES 1-300 who
22 will have same or similar allegations made against them. LEWIS is ignorant of the true
23 names and capacities of the Defendants sued herein as DOES 1- 300. Plaintiffs will seek
24 leave of Court to amend this Complaint to set forth their true names and capacities thereof,
25 when same haves been ascertained.

26 85. LEWIS is informed and believes, and based herein alleges, that at all times mentioned
27 in this Complaint, each of the Defendants, including Defendant DOES 1-300 inclusive, were
28 acting in concert and/or conspiracy with at least one other Defendant in furtherance of one or

1 more Criminal Schemes.

2 86. Plaintiffs LEWIS, LORRAINE, LEWIS III, SCOTT, MINORS, TBCS, and
3 PAEGELS are joined because the facts and parties are so intertwined that complete relief
4 cannot otherwise be granted.

5 87. LEWIS is informed and believes that on or about March, 2009, Brian Williams
6 ("WILLIAMS") was first introduced to TODHD [known at that time as MYEZTV] by an
7 agent of VARONOS. WILLIAMS was solicited to bring advertisers to the TODHD
8 "network" and was told that Defendants GRAMMER, CORNELL, and BLEU were all
9 channel holders, investors and promoters in the "company."

10 88. LEWIS is informed and believes that WILLIAMS established contact with
11 VARONOS and on November 15, 2010, BRIAN WILLIAMS, as an independent contractor,
12 brokered a one hundred thousand dollar (\$100,000.00) sponsorship agreement between
13 Defendant TODHD and Defendant VARONOS by and on behalf of the well-known "trade"
14 publication Daily Variety ("Variety"), for sponsorship rights arising from the Variety Power
15 of Comedy Event ("EVENT") that took place on December 4, 2010. EXHIBIT 24-A thru K.
16 VARONOS, JACKSON, MULLIGAN and TSOFTNET received the benefits and failed to
17 pay on the agreement.

18 89. LEWIS is informed and believes that the terms of said agreement gave Defendant
19 TODHD a "Premier Level Sponsorship" package for the Event in exchange for a
20 \$100,000.00, tax-deductible donation, payable by Defendant TODHD/ VARONOS to Brian
21 Williams and due by December 1, 2010, through an invoice from Brian Williams. EXHIBIT
22 24-C & D.

23 90. LEWIS is informed and believes that under the terms of the Brian
24 Williams/VARONOS Agreement, VARONOS would pay Brian Williams, \$100,000.00 in
25 exchange for numerous and extensive advertising concessions by Variety.

26 91. LEWIS is informed and believes that the sponsorship package included, inter alia,
27 extensive advertising with the "TODHD" logo in a full page 4-color ad in Variety (EXHIBIT
28 33), guest passes at the EVENT, and an "Opportunity to have TODHD host, on the red carpet

1 and backstage, to capture by videotape unique clips with the comedians/performers.”
2 EXHIBIT 24-A & B.

3 92. LEWIS is informed and believes that VARONOS and FLEMING breached the
4 contract by failing to pay the money for the EVENT’S advertising.

5 93. LEWIS is informed and believes that GRAMMER promised to “take care of this,”
6 indicating that he would pay on the agreement, but GRAMMER failed to do so.

7 94. LEWIS is informed and believes that GRAMMER and CORNELL reaped the benefits
8 of the “free” advertising as their photos appeared in Variety. EXHIBIT 33.

9 95. LEWIS is informed and believes that Defendant STAROPOLY was advertised to be a
10 “multi-level” marketing company, but in actuality it is a Pyramid Scheme devised by
11 GRAMMER, VARONOS, FLEMING, BLEU and CORNELL for the purpose of stealing
12 money, credit card information, and other personal property (phishing) and information from
13 its victims.

14 96. LEWIS is informed and believes that GRAMMER, BLEU and CORNELL freely
15 advertised the TODHD and STAROPOLY Criminal Schemes through websites and sales
16 materials as members of the Criminal Scheme.

17 97. LEWIS is informed and believes that as GRAMMER’S public relations attorney
18 disclaimed STAROPOLY and TODHD as “scams” that stole \$1.0 million from GRAMMER,
19 GRAMMER continued to be a spokesperson for STAROPOLY and TODHD.

20 98. GRAMMER never took any action against those he claimed defrauded him—
21 VARONOS and FLEMING. According to “insider” Gary Arbaugh, GRAMMER was the
22 *originator* of the TODHD scam. EXHIBIT 92-A.

23 99. LEWIS is informed and believes that GRAMMER, FLEMING, MILLER, KING,
24 JACKSON, MULLIGAN and VARONOS advertised TODHD as “Kelsey’s Network.”

25 100. GRAMMER and BLEU were Administrators of TODHD. *See* EXHIBIT 92-
26 H.

27 101. STAROPOLY’S site and sales and marketing materials featured GRAMMER on
28 “conference calls” and numerous photographs of GRAMMER. EXHIBIT 56. One photo had

1 his name alongside the words "The World's First Monetized Social Network of the Stars."
2 EXHIBIT 56-B.

3 102. LEWIS is informed and believes that STAROPOLY was advertised as: "The
4 WORLD'S FIRST MONETIZED SOCIAL NETWORK of the Stars!" and the "exclusive
5 worldwide marketing arm for TODHD." EXHIBIT 19-A thru C. The ad features photos of
6 GRAMMER, BLEU and CORNELL. In fact, TODHD and STAROPOLY were "fronts" for
7 the Criminal Schemes to commit credit card fraud and other theft. EXHIBIT 19-D & E show
8 the PayPal sign-up button.

9 103. LEWIS is informed and believes that GRAMMER issued an invitation to the public at
10 large to join him on the STAROPOLY "launch call." EXHIBIT 22.

11 104. LEWIS is informed and believes that CORNELL recruited LEWIS as a STAROPOLY
12 Associate, for which he paid and lost money in the scheme.

13 105. LEWIS is informed and believes that the STAROPOLY "sales pitch" was skillful,
14 pressured and preyed on those suffering financially in a bad economy. Defendants
15 GRAMMER, CORNELL, BLEU, VARONOS and FLEMING guaranteed that STAROPOLY
16 was going to unite small businesses across the country and bring back the American economy.

17 106. LEWIS is informed and believes that GRAMMER and CORNELL personally phoned
18 LEWIS to encourage his enrollment saying that "STAROPOLY was an excellent business
19 opportunity."

20 107. LEWIS is informed and believes that GRAMMER, BLEU and CORNELL knew or
21 should have known that people and fans would rely on their celebrity; hundreds if not
22 thousands enrolled in one of the Criminal Scheme as a result.

23 108. LEWIS is informed and believes that GRAMMER, BLEU and CORNELL enrolled
24 and promoted STAROPOLY in notices to millions of fans on TWITTER, FACEBOOK, and
25 all over the World Wide Web ("WEB").

26 109. LEWIS is informed and believes that STAROPOLY conference calls featured
27 GRAMMER, who personally promoted STAROPOLY. EXHIBIT 20.

28 110. LEWIS is informed and believes that on or about September, 2009, Plaintiffs TBCS

1 and its owners, the PAEGELS, were approached by JUNCO and TORO with a business
2 “opportunity” that would assist said Plaintiffs in monetizing their new internet-based venture.
3 JUNCO and TORO were the owners of GREEN, which they promoted as their business in
4 partnership with VARONOS, FLEMING, BLEU, CORNELL, JACKSON, MULLIGAN and
5 GRAMMER. TBCS and the PAEGELS were swindled by said Defendants as members of a
6 well-organized Criminal Scheme. All of the Defendant’s assertions were false.

7 111. LEWIS is informed and believes that JUNCO and TORO stole nearly \$80,000.00
8 from Plaintiffs by selling them a “sub-channel” on the TODHD “network” under their fake
9 “business,” GREEN. EXHIBIT 16-V thru AM & EXHIBIT 26.

10 112. LEWIS is informed and believes that after TBCS and the PAEGELS discovered the
11 swindle of JUNCO and TORO, they were persuaded by VARONOS and FLEMING to
12 “ignore JUNCO and TORO and do business with the *source*,” meaning themselves.
13 VARONOS and FLEMING continued the swindle by selling TBCS and the PAEGELS what
14 appeared to be a “better opportunity.” In reality, said Plaintiffs were just being “passed
15 around” to other members of the Criminal Scheme.

16 113. LEWIS is informed and believes that VARONOS and FLEMING stole another
17 \$23,000.00 when they sold Plaintiffs PAEGELS and TBCS their “own” channel on TODHD.
18 EXHIBIT 16-B thru L.

19 114. LEWIS is informed and believes that eventually, MILLER, NIVEN and KING were
20 employed to add their “marketing expertise.” FLEMING introduced the PAEGELS to
21 MILLER and introduced him as an advertising expert. MILLER introduced PAEGELS to
22 NIVEN and KING. Because MILLER, NIVEN and KING operated in furtherance of one or
23 more Criminal Schemes, it finally became clear that MILLER, NIVEN and KING were just
24 the final stop in the chain of the “swindle.”

25 115. LEWIS is informed and believes that MILLER, NIVEN and KING ultimately stole
26 not only money, but invaluable property with virtually unlimited monetizing potential as the
27 material they stole was new and unique to the marketplace.

28 116. LEWIS is informed and believes that MILLER and KING also ruined numerous pre-

1 existing business relationships that TBCS owned as assets.

2 117. LEWIS is informed and believes that GRAMMER, CORNELL, BLEU, VARONOS,
3 FLEMING, ROBINSON, WORMLEY, JUNCO, TORO, MILLER, NIVEN and KING
4 conspired to steal \$200,000 in cash, invaluable property, and business partners from
5 TBCS/PAEGELS.

6 118. LEWIS is informed and believes that when TBCS, the PAEGELS and others sued said
7 Defendants in California, PLUIM, THOMAS, and VARGAS conspired with WILEMAN,
8 MILLER, CORNELL, KELETI, VARONOS, ROBERTS, FIN INST, INS, KING,
9 FLEMING, JUNCO, TORO and other members of the Criminal Scheme to unjustifiably
10 dismiss the case.

11 119. LEWIS is informed and believes that ALL Defendants have conspired with one or
12 more other members of a Criminal Scheme to commit at least two acts of corruption.

13 120. LEWIS is informed and believes that said Criminal Schemes—originating in
14 California, Florida, Colorado, Massachusetts and Arizona—reached into the state of
15 Tennessee to victimize LEWIS.

16 121. LEWIS is informed and believes that these Criminal Schemes have operated for
17 decades and are responsible for wreaking devastation upon numerous other individuals and
18 businesses in much the same or similar ways as they have done to Plaintiffs in this matter.

19 122. As the Private Attorney General, LEWIS intends to “corral” members of these
20 Criminal Schemes, seek justice and punishment for the harm they have caused, and put an end
21 to their activities for the sake of the people of the United States and the citizens of its affected
22 states.

23 123. Damages for these Criminal Schemes are itemized in ¶ 958.

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FIRST CAUSE OF ACTION

OBSTRUCTION OF JUSTICE (INCLUDING, BUT NOT LIMITED TO: JUDICIAL RACKETEERING, ATTEMPTED MURDER, COLLUSION, CONSPIRACY, PERJURY, DEFAMATION, FALSE REPORTING, FAILING TO ADJUDICATE, BRIBERY, ASSAULT & TECHNOLOGY HACKING AND WIRE TAPPING) asserted by Plaintiffs LEWIS, LORRAINE, LEWIS III, PAEGELS, TBC SPORTS, and DOE Plaintiffs 1-300 against INS, FIN INST, CARMAX, GRAMMER, CORNELL, FLEMING, FARMERS, ZURICH, MARYLAND, MILLER, KING, NEWELL, VARONOS, WILEMAN, YAO, PLUIM, SHERMAN, COLE, WELCH, HAIGHT, VARGAS, THOMAS, WALSH, FORD, KEHOE, KELETI, COX, HADDOCK, ROBERTS, JUNCO, TORO, WORMLEY, BEATY, INS, STELL, CAMPION, SCHWARTZ, FARGO, BORRIS, BASLE, SLOUGH, NEWELL, WESLEY, GOLDEN, KRATTI, EDMON, COLE, FANGARY, INS, FIN INST, BEATY, ROBINSON, YAO, KELETI, ALMEIDA, JACKSON, MULLIGAN, B.H.P.D., BLEU, HADDOCK, NIVEN, WESTBROOK, KEHOE, B.H.P.D and DOE Defendants 1-300 inclusive.

(18 U.S.C. § 1962(c); The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; U.S. Const. amends. VIII and XIV; 18 U.S.C. 2510 & 2511 *et seq.*; T.C.A. § 39-12-201 *et seq.*; T.C.A. § 39-16-602 *et seq.*; T.C.A. § 39-16-705; T.C.A. § 39-14-602(b)(4); T.C.A. § 39-14-602(a); Judicial Canons 1 and 2; Tennessee Adult Protection Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; Fl. Stat. § 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6; T.C.A.71-6-120 *et seq.* Tenn. Adult Protection Act; T.C.A. § 39-12-101; T.C.A. § 39-12-102; T.C.A. § 39-12-103; T.C.A. § 39-17-315; T.C.A. § 39-17-309; T.C.A. § 39-17-120; T.C.A. § 39-16-702; T.C.A. § 39-12-204.)

124. By this reference, Plaintiffs herein incorporates each and every allegation of the foregoing paragraphs 1-123 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS

DEFINITION OF CRIMINAL SCHEME "A" PREDICATE ACTS: THOSE ACTS COMMITTED DURING COMMISSION OF WRONGFUL ACTS AND THE UNDERLYING FRAUDS FOR WHICH LEGAL ACTION WAS ORIGINALLY BROUGHT.

125. VARONOS, FLEMING, MILLER, KING, CORNELL, GRAMMER, BLEU, FIN
INST, INS, ROBINSON, WORMLEY, JUNCO, TORO, and BEATY actively engaged in
fraud and corruption by lying, cheating and stealing Plaintiffs money and property, either
directly or indirectly.

126. WILEMAN has a history of obstructing justice through fraud, perjury and avarice.
EXHIBIT 5-S thru W is *Firestone* where the appellate court admonished him for

1 misrepresentations of fact and law.

2 127. SHERMAN obstructed justice and conspired with FANGARY to subvert the U.S.
3 Constitution Due Process and state and federal laws by suborning FANGARY'S wrongful
4 acts: perjury, discovery violations, and federal mail/mailbox tampering by FANGARY.

5 128. SHERMAN awarded FANGARY sanctions against NELLE for insisting that
6 FANGARY follow proper procedures of law. Despite SHERMAN'S lesson to FANGARY
7 on what he was entitled to, SHERMAN nonetheless sanctioned NELLE for offering
8 FANGARY a true and complete *copy* of the files instead of the *original*.

9 129. FANGARY and SHERMAN failed to sign the court's order, precluding appeal.

10 130. FANGARY misinformed NELLE as to SHERMAN'S ruling.

11 131. SHERMAN, PLUIM, COLE, WELCH, and HAIGHT obstructed justice by refusing to
12 adjudicate/ignoring Plaintiffs' properly-filed motions and petitions.

13 132. SHERMAN, PLUIM, COLE, WELCH, and HAIGHT obstructed appellate justice by
14 persistently failing to rule on proper motions and petitions.

15 133. SHERMAN, COLE, PLUIM, WELCH and HAIGHT obstructed justice by
16 misrepresenting financial information on their Fair Political Practices Form 700 ("700's").
17 EXHIBIT 78 are copies of this form for the last 7 years for each said Defendant.

18 134. On the 700's, SHERMAN, COLE, PLUIM, WELCH and HAIGHT each represented
19 that they did not own retirement accounts except that PLUIM claimed 12 new retirement
20 accounts in 2012.

21 135. On her 700's, COLE misrepresented her husbands' business and income despite
22 having filed "Amendments" for each of the last 7 years.

23 136. HAIGHT obstructed justice by ruling that STELL and CAMPION did not owe a duty
24 to the heirs of an intestate decedent.

25 137. HAIGHT conspired with STELL and CAMPION to deprive heirs of their \$250,000.00
26 inheritance through perjury, avarice, and countless violations of federal and state law.

27 138. CORNELL, COLE, SCHWARTZ and B.H.P.D. obstructed justice by conspiring
28 against LEWIS via perjury, due process violations, defamation, false warrant, and invasion of

1 privacy.

2 139. CARMAX and FARGO conspired to falsely claim that LEWIS owed \$10,000.00 on
3 his automobile in order to get the Knoxville Sheriff to arrest LEWIS.

4 140. Said arrest was for the sole purpose of obtaining a mug shot of LEWIS in furtherance
5 of the Criminal Scheme.

6 141. For damages as a result of this Criminal Scheme, see ¶ 958.

7 **CRIMINAL SCHEME "B" PREDICATE ACTS**

8 DEFINITION OF SCHEME "B" PREDICATE ACTS: Criminal acts incurred by Defendants in court
9 during litigation of underlying cases. no.'s GC047909, 13875, 13899, 13895, GC047909, 11-CV-
10 08810GW(SHx), PROPS0700007, 30-2012-00609008-PR-TR-CJC, 30-2012-00609235-PR-TR-CJC,
11 SS022572, 11S00624, BC495150, PAS 11S00624.

12 142. The transcripts and/or minute orders clearly show that PLUIM, THOMAS, VARGAS,
13 VARONOS, ROBERTS, WILEMAN, STELL, CAMPION, WELCH, BORRIS, BASLE,
14 SLOUGH, WESLEY, GOLDEN, KRATTI, EDMON, COLE, HAIGHT, JUNCO,
15 CORNELL, TORO, KING, KELETI, FANGARY, SHERMAN, INS, FIN INST, BEATY,
16 ROBINSON and MILLER conspired in furtherance of the Criminal Schemes. *See generally,*
17 EXHIBITS 1-92.

18 143. The transcripts prove that PLUIM tried to prevent NELLE and LEWIS from disputing
19 the multitude of lies told by KING, WILEMAN, MILLER, ROBERTS, VARONOS, JUNCO,
20 INS, FIN INST on the record. *See generally* EXHIBIT 2 showing innumerable instances of
21 PLUIM obstructing justice by preventing NELLE and LEWIS from speaking as to
22 defendant's false statements and clearly expressing bias.

23 144. VARONOS, MILLER, PLUIM and ROBERTS conspired to deceive the court and
24 Plaintiffs on pretext that VARONOS had not been served at all. VARONOS was not only
25 served personally, but also numerous times through a Nevada resident agent as a principle in
26 one of more corporations. Despite that NELLE proved that VARONOS, ROBERTS, and
27 MILLER were lying about the service being invalid, PLUIM dismissed VARONOS from the
28 entire suit without any offer of proof by VARONOS being made or giving NELLE an

1 opportunity to object.

2 145. ROBERTS served as counsel to the Criminal Scheme by representing JUNCO,
3 TORO, VARONOS, and FLEMING in case no. GC047909.

4 146. ROBERTS, JUNCO, VARONOS and MILLER lied to the court on December 14,
5 2012 and January 18, 2013. EXHIBIT 2-CJ thru CM and DC thru DQ.

6 147. ROBERTS perjured himself about VARONOS, JUNCO, TORO, and FLEMING not
7 having been served with the summons and complaint—despite that both JUNCO and TORO
8 had “answered” it on September 14, 2011. VARONOS and FLEMING were not only served,
9 but FLEMING’S service was video-recorded and VARONOS’S service was acknowledged
10 by MILLER in court on October 14, 2011. PLUIM obstructed justice when he violated
11 NELLE’S right to be heard.

12 148. At the December 14, 2012 hearing PLUIM and WILEMAN both admitted to bribery
13 in the form of a “flat fee.” EXHIBIT 2-CM thru CN. ROBERTS acknowledged same by
14 expressing that it was “the gift that kept on giving.”

15 149. WILEMAN furthered the Criminal Scheme by speaking in court on behalf of ALL
16 Defendants when he lacked standing. His attendance created pressure on PLUIM, THOMAS
17 and VARGAS to adhere to the Criminal Scheme.

18 150. WILEMAN attended hearings despite having *no* legitimate reason for being there.
19 NEWELL furthered the activities of the Criminal Scheme by conspiring with KING,
20 WILEMAN, INS to permit WILEMAN to act on KING’S behalf without formal substitution.

21 151. NEWELL gave perjured testimony in federal court on December 8, 2011 about his
22 representation of KING.

23 152. MILLER assaulted PAEGEL’S process server with a gun.

24 153. MILLER and WILEMAN admitted to owning numerous unregistered firearms.
25 EXHIBIT 14-AT.

26 154. PLUIM, THOMAS and VARGAS ignored any and all pleadings that proved
27 wrongdoing by WILEMAN, MILLER, VARONOS, GRAMMER, ROBERTS, JUNCO,
28 TORO, FLEMING, KING, INS., FIN INST, NEWELL, CORNELL, YAO, and KELETI.

- 1 155. PLUIM refused to accept exculpatory evidence about LEWIS.
- 2 156. PLUIM, VARGAS and THOMAS conspired and colluded with the Defendants in
- 3 furtherance of illegal actions in—and out of—court.
- 4 157. CORNELL, PLUIM, VARGAS, THOMAS, NEWELL, KING, INS, WILEMAN and
- 5 YAO conspired to protect WILEMAN, YAO, MILLER and KING and ensure uninterrupted
- 6 success of the Criminal Scheme. *See generally* EXHIBIT 2.
- 7 158. PLUIM openly coached defendants as to how to get a dismissal. *See generally*,
- 8 EXHIBIT 2.
- 9 159. PLUIM and WILEMAN conspired to obstruct justice via perjury, due process, and on
- 10 rulings.
- 11 160. WILEMAN, MILLER, INS, KING, JUNCO, CORNELL, KELETI, YAO, PLUIM,
- 12 THOMAS, VARGAS, COLE, ROBERTS, VARONOS and attorneys of record for FIN INST
- 13 conspired to obstruct justice via perjury. *See generally*, EXHIBIT 2.
- 14 161. ALMEIDA actively participated in the Criminal Scheme by refusing to respond in any
- 15 responsible way to inquiries about WILEMAN'S representation; ALMEIDA refused to
- 16 corroborate that WILEMAN legitimately represented KING. EXHIBIT 16-AN thru AQ.
- 17 162. PLUIM and THOMAS conspired and violated federal conflict of interest statutes by
- 18 coordinating their efforts against LEWIS in a number of ways, including, but not limited to,
- 19 dismissing LEWIS'S SUPPLEMENT where PLUIM and THOMAS were both named
- 20 defendants. EXHIBIT 2-BC, trans. Sept. 14, 2012. And most of the plaintiffs and
- 21 defendants were dismissed *sua sponte* on Dec. 14, 2012. EXHIBIT 3-H & I.
- 22 163. PLUIM and THOMAS regularly conspired to generally deny parties their rights to due
- 23 process. THOMAS regularly conducted ALL Court Call hearings instead of PLUIM. While
- 24 PLUIM'S name is on the Court Call list, clerk THOMAS handled all such hearings instead.
- 25 Callers regularly refer to her as “your honor,” which THOMAS failed to correct.
- 26 164. Numerous times using CourtCall, THOMAS was heard making “deals” with certain
- 27 attorneys. THOMAS was heard negotiating for special favors that *inter alia* contravened the
- 28 LASC “fast track” system. One such case involved an attorney who requested more time to

1 prepare for trial. THOMAS said she couldn't grant the request, however she suggested that
2 being assigned to mediation would cause at least a 60-day delay. As a result, the "court"
3 [THOMAS] assigned the case to mediation, giving that attorney what he wanted—at the
4 court's and parties expense.

5 165. PLUIM, THOMAS, and VARGAS conspired with defendants and CORNELL to
6 dismiss case no. GC047909, despite 14 defaults. EXHIBIT 2-AT thru AV and adopted by
7 PLUIM, EXHIBIT 2-AY.

8 166. On December 14, 2012, PLUIM, THOMAS and VARGAS conspired to deny LEWIS
9 and NELLE due process through CourtCall changing a status conference to *sua sponte*
10 dismissals of most defendants. EXHIBIT 2-CB thru CW; EXHIBIT 3-H thru I; and EXHIBIT
11 4, CourtCall cancellations.

12 167. PLUIM, VARGAS and THOMAS actively participated in the Criminal Scheme by
13 giving legal "protection" from liability through the Los Angeles Superior Court System;
14 PLUIM regularly ignored the California Codes, Rules of Court, the Civil RICO ACT and
15 common law. *See generally*, EXHIBIT 2 and the Tentative Rulings in EXHIBIT 3.

16 168. PLUIM dismissed case no. GC047909 against 31 Defendants despite irrefutable and
17 uncontroverted proof that Defendants defrauded Plaintiffs and committed 33 other offenses
18 against them. *See generally*, EXHIBIT 2-DU thru DV for dismissal rationale.

19 169. The extent of PLUIM'S involvement in the conspiracy is so blatant that he even
20 refused to order WILEMAN "cease and desist" harassing LEWIS and his disabled brother at
21 LEWIS'S personal residence. *See* EXHIBIT 2-BO thru BR., EXHIBIT 3-D thru G. PLUIM
22 ignored WILEMAN'S continued harassment and invasion of LEWIS'S privacy despite
23 WILEMAN'S in-court admission that he telephoned LEWIS'S home and questioned
24 LEWIS'S disabled brother.

25 170. CORNELL conspired with said Defendants to discredit LEWIS by lying, stealing,
26 hacking, assaulting, threatening, and endangering him and his children and grandchildren.
27 EXHIBIT 54.

28 171. CORNELL admitted to being in collusion with GRAMMER "since July," but didn't

1 say of what year! Given the facts and circumstances, CORNELL colluded with GRAMMER
2 beginning before the case was filed in August, 2011. EXHIBIT 7. In fact, CORNELL—
3 while posing as a plaintiff—colluded with the Defendants as a co-conspirator in furtherance
4 of the Criminal Scheme. Ultimately, CORNELL'S cooperation with Defendants cost
5 Plaintiffs millions of dollars in litigation costs.

6 172. As planned, on September 13, 2012 ALL the Defendants unanimously waived
7 CORNELL'S liability in the case when she asked PLUIM to dismiss her as a Plaintiff.

8 173. CORNELL obstructed justice via perjury, fraud, deceit, and misrepresentations to
9 PLUIM, COLE, SCHWARTZ, and plaintiffs; CORNELL has an on-going and well-
10 established pattern of publicly lying to/about others.

11 174. MILLER obstructed justice via perjury to the courts and by filing false reports against
12 NELLE with the Walnut, CA Sheriff's dept., the Glendora police dept., and the CA state bar.

13 175. WILEMAN, YAO, KELETI, INS., JUNCO, MILLER, KING, VARONOS, FIN INST
14 and ROBERTS actively participated in Criminal Scheme B via perjury.

15 176. FARMERS obstructed justice by concealing the date of when it hired WILEMAN.

16 177. WILEMAN'S constant, on-going, and continuous lack of knowledge of the rules and
17 his misrepresentations of law has caused LEWIS to doubt his status as an attorney.

18 178. At the time that WILEMAN removed California case no. GC047909 to federal
19 jurisdiction (case no.11-cv-08810-GW), he so corrupted the original complaint as to cause it
20 to become incomprehensible. TBCS/PAEGELS did not make the discovery until just prior to
21 the remand.

22 179. WILEMAN altered 206 pages of complaint GC047909 and committed perjury by
23 swearing that he was submitting a “true and exact” copy. EXHIBIT 6 is a comparative
24 analysis between the original complaint filed by TBCS/PAEGELS and the corrupted
25 complaint submitted by WILEMAN at the time he removed the case to federal court.
26 WILEMAN never refuted this allegation.

27 180. YAO and KELETI conspired with WILEMAN to then complain about being unable to
28 decipher the corrupted complaint.

- 1 181. WILEMAN was not any attorney of record at the time he removed the case; he
2 abjectly ignored the state and federal requirements for substituting as the attorney of record;
3 he nevertheless clogged the courts with pleadings.
- 4 182. CORNELL, PLUIM, THOMAS, VARGAS, VARONOS, MILLER, JUNCO, INS,
5 FIN INST, KING, NEWELL, YAO, KELETI, and WILEMAN conspired and colluded to
6 defraud plaintiffs by wasting time, clogging, and lying about facts and law at hearings and in
7 pleadings.
- 8 183. PLUIM, THOMAS, and VARGAS denied TBCS/PAEGELS their constitutional rights
9 to due process by ignoring their pleadings, discriminating against them with respect to
10 hearings, and conspiring with WILEMAN, NEWELL, ROBERTS, MILLER, VARONOS,
11 JUNCO and CORNELL to vex, defame, mislead and harass NELLE in court.
- 12 184. PLUIM regularly granted Defendants' motions and denied Plaintiffs' motions without
13 reading them or knowing the contents of same or being able to articulate any rationale.
14 Numerous transcripts showed PLUIM'S on-going bias and apparent bribery. *See generally*
15 EXHIBIT 2.
- 16 185. PLUIM, KELETI and THOMAS denied LEWIS'S timely petitions for peremptory
17 challenge based upon PLUIM'S overt act of bias for ordering LEWIS to "shut up, get out of
18 my courtroom, and never come back," which PLUIM said without any provocation
19 whatsoever.
- 20 186. PLUIM, KELETI and THOMAS denied NELLE'S statement for disqualification
21 based on bias.
- 22 187. WILEMAN, MILLER and PLUIM colluded to put on a pretext in court to "serve"
23 MILLER with a third copy of the complaint; he had already been served by the Sheriff and
24 LEWIS. PLUIM ordered NELLE to re-serve MILLER with a corrupt copy of the complaint
25 supplied by WILEMAN in order to legitimize the corrupted complaint and/or cause NELLE
26 to commit a felony as part of the Criminal Scheme. See EXHIBIT 2-Y:12-13 in particular
27 where PLUIM asks NELLE to mail MILLER with a "correct" copy. All present knew that
28 MILLER had already been served with two correct copies of the complaint.

188. YAO was hired by ALMEIDA to represent KING and to draft pleadings, however
YAO regularly misstated facts and laws. She criticized the [corrupted] "complaint" as
"incomprehensible" and called Plaintiffs' counsel names ("contumacious") for submitting a
complaint in that condition to the court. The complaint she was referring to was the version
that had been altered by WILEMAN. This was a fraudulent attempt to mislead the court.

189. LEWIS and NELLE spent an inordinate amount of time correcting the legal errors
replete in pleadings filed by WILEMAN, YAO and KELETI.

190. WILEMAN and YAO refused to comply with Plaintiff's subpoena for YAO'S
"working copy" of the complaint she was referring to in drafting her pleadings. PLUIM
ignored PAEGEL'S motion to compel YAO to produce her working copy of the complaint.

191. Subsequently, YAO notified NELLE that she was no longer working on the case via
an e-mail to NELLE. YAO failed to file proper withdrawal paperwork.

192. MILLER conspired with WILEMAN to try to have NELLE arrested by the Glendora
Police Dept. by filing a false report against her. WILEMAN then sued NELLE in Superior
Court for same incorporating MILLER'S false police report. EXHIBIT 61.

193. For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "C" PREDICATE ACTS:

DEFINITION OF SCHEME "C" PREDICATE ACTS: Criminal Scheme C consisted of activities
engaged in by Defendants for the express purpose of impeding LEWIS'S investigations as PAG
under the Civil RICO Act.

194. CORNELL obstructed justice by stealing LEWIS'S social security card, veteran's
administration medical card, and two cell phones in order to access his private information
and create a false defamatory profile of LEWIS that PLUIM, THOMAS, VARGAS,
WILEMAN, MILLER, VARONOS, ROBERTS, JUNCO and CORNELL used against
LEWIS in court in order to discredit him and his pleadings. EXHIBIT 8-A & B.

195. CORNELL, MILLER, KEHOE, HADDOCK, COX and FORD spread said false
profile to some 5000 internet websites.

196. CORNELL obstructed justice by filing false reports against LEWIS with

- 1 SCHWARTZ, B.H.P.D., the Temple City Police Dept., and COLE.
- 2 197. CORNELL conspired with PLUIM, MILLER, WILEMAN, INS, and FIN INST to
3 defame LEWIS and NELLE in hearing.
- 4 198. PLUIM, THOMAS, and VARGAS denied LEWIS his constitutional rights to due
5 process by ignoring his pleadings, discriminating against him, and conspiring with
6 WILEMAN, KELETI, YAO, MILLER, VARONOS, and CORNELL to vex, harass, threaten
7 and endanger his life.
- 8 199. COLE obstructed justice by conspiring with CORNELL against LEWIS to accept
9 evidence without due process.
- 10 200. CORNELL, COX, HADDOCK, KEHOE, and MILLER endangered LEWIS, LEWIS
11 III, LORRAINE, and MINORS 1, 2, 3, and 4 by exposing them all to predators. This was
12 done by putting their names, addresses and maps to their homes and work addresses over the
13 internet. *See example*, EXHIBIT 9, for CORNELL'S admission to same on her Facebook.
- 14 201. CORNELL, WILEMAN, ROBERTS, VARONOS, YAO, INS., FIN. INST., WALSH,
15 FORD, KEHOE, COLE, KELETI, KING, PLUIM, JUNCO and MILLER obstructed justice
16 by conspiring to falsely accuse LEWIS of committing illegal acts.
- 17 202. CORNELL, PLUIM, THOMAS, VARGAS, VARONOS, MILLER, JUNCO, INS,
18 FIN INST, KING, NEWELL, YAO, KELETI, and WILEMAN obstructed justice by
19 conspiring to defraud LEWIS by wasting time, clogging dockets, and lying about facts and
20 law.
- 21 203. CORNELL admitted to hacking LEWIS'S Facebook.
- 22 204. CORNELL hacked into LEWIS'S Bank of America checking account, his 2012 I.R.S.
23 tax return, his Facebook, Linked-In, and e-mails. EXHIBIT 10, A – K.
- 24 205. At hearing on October 19, 2012, at the direct request of WILEMAN, VARGAS
25 phoned the sheriff's office to send three Sheriffs to intimidate LEWIS and NELLE who were in
26 regular attendance there. PLUIM instructed the Sheriffs to keep LEWIS and NELLE from
27 being "heard" under the threat of immediate incarceration.
- 28 206. THOMAS tried to keep LEWIS from court by telling him, "You have guts coming

1 back here.” This statement was made at the hearing following PLUIM’S order for LEWIS to
2 “Shut up, get out, and never come back.”

3 207. PLUIM ignored LEWIS’S motion and complaints for relief from harassment of his
4 family. Instead, PLUIM actively encouraged harassment of LEWIS, LEWIS III,
5 LORRAINE, and further endangered the MINORS.

6 208. PLUIM further harassed and intimidated LEWIS by threatening to have him
7 incarcerated, but refused to state any facts constituting a reason as to why. PLUIM,
8 THOMAS, and VARGAS conspired to pretend to issue a “no-bail warrant” for LEWIS’S
9 arrest ostensibly based solely on WILEMAN’S request without any proof. EXHIBIT 8.

10 209. PLUIM conspired with WILEMAN to continue the hearing on October 19, 2012
11 because WILEMAN said he “wasn’t ready” despite PLUIM’S scheduling 1 hour of time.
12 PLUIM had threatened LEWIS with contempt if he didn’t attend despite knowing that
13 LEWIS’S doctor forbid his travel to California. This charade was a ruse to harass LEWIS and
14 obstruct justice by denying due process.

15 210. PLUIM furthered the Criminal Scheme by ignoring LEWIS and PAEGEL’S/TBCS
16 motions and pleadings that demanded evidence of the allegations made by PLUIM,
17 CORNELL, VARONOS, WILEMAN, JUNCO, KELETI and ROBERTS.

18 211. PLUIM granted all of defendants’ motions without any offers of proof of any kind.

19 212. All Plaintiffs have been harassed, threatened, stalked, hacked, defrauded, defamed,
20 and blackmailed by one or more of Defendants CORNELL, MILLER, COX, WILEMAN,
21 PLUIM, THOMAS, VARONOS, TORO, JACKSON, MULLIGAN, JUNCO, ROBERTS,
22 WALSH, FORD, SCHWARTZ, B.H.P.D., FANGARY, STELL, CAMPION, WELCH,
23 HAIGHT, COLE, SHERMAN, HADDOCK, KING, NIVEN, COX, ROBINSON,
24 WESTBROOK WORMLEY, and KEHOE.

25 213. PLUIM, VARGAS, and THOMAS destroyed evidence belonging to Plaintiffs in
26 court—on the record—on January 18, 2013 by dismantling PAEGEL’S/TBCS conformed
27 copy of a document they already had without her permission—for no apparent reason.
28 EXHIBIT 2-DE thru DF.

- 1 214. COLE, WELCH, HAIGHT, SHERMAN, GOLDEN, KRATTI, BORRIS, BASLE,
2 SLOUGH, WESLEY, EDMON, PLUIM, THOMAS and VARGAS regularly decided matters
3 in ways that were illogical and unrelated to rules of law and canons of judicial conduct.
- 4 215. PLUIM, VARGAS and THOMAS continuously denied LEWIS and PAEGEL their
5 constitutional rights to due process during hearings, in docketing pleadings, and in refusing to
6 properly process requests for default.
- 7 216. THOMAS and VARGAS regularly and habitually practiced law without a license by
8 giving legal advice, drawing legal conclusions, making rulings, and conducting telephonic
9 hearings with attorneys and other parties outside PLUIM'S hearing.
- 10 217. VARONOS threatened LEWIS'S life on the record by stating that LEWIS was a
11 "dead man." PLUIM said and did absolutely nothing about VARONOS'S threat.
- 12 218. PLUIM, THOMAS, VARGAS, WILEMAN, KELETI, MILLER, FORD, WALSH,
13 CORNELL, COX, KEHOE, WESTBROOK and VARONOS conspired to extricate LEWIS'S
14 involvement in the case via various means including but not limited to: threatening,
15 intimidating, defaming, endangering, denying due process, issuing a no-bail warrant, invading
16 his privacy, ignoring his pleadings, and generally harassing him. *See generally*, EXHIBIT 2;
17 excerpt of docket, EXHIBIT 11- D; and EXHIBIT 12.
- 18 219. PLUIM, VARGAS and THOMAS ignored three letters from LEWIS'S doctor that he
19 was not to travel. The distance between Tennessee and California exceeds 2200 miles and
20 LEWIS is not allowed to fly. EXHIBIT 13. Nevertheless, LEWIS was denied access to
21 hearings via CourtCall. PLUIM issued an order for LEWIS to appear in his court room on
22 October 19, 2012, which LEWIS complied with, despite his doctor's orders, only to be denied
23 his right to be heard. PLUIM, THOMAS, VARGAS, WILEMAN, VARONOS, MILLER,
24 INS, FIN INST, JUNCO and KELETI were all aware that LEWIS was in treatment for
25 Leukemia—and that he was supposed to be in treatment in Florida on October 19, 2012
26 instead of in a California courtroom. *See* EXHIBIT 2-P:14-16.
- 27 220. PLUIM, VARGAS and THOMAS conspired to deny LEWIS and TBCS/PAEGELS
28 their constitutional rights to due process by specifically singling them out to refuse to allow

1 them access to the December 14, 2012 hearing via CourtCall and then lying about it on the
2 record. As a result of LEWIS'S absence, PLUIM was effectively able to get LEWIS out of
3 his court, to shut up, and never to come back or face immediate arrest WITHOUT BAIL
4 despite it being unwarranted and illegal. Even if LEWIS had practiced law without a license,
5 a misdemeanor such as that hardly justifies a no-bail warrant. Incarceration would have
6 deprived LEWIS of medical treatment and amounted to a death sentence for LEWIS. LEWIS
7 herein alleges that this was the true purpose of this Criminal Scheme.

8 221. The scenario described in the preceding paragraph constitutes "attempted murder" of
9 LEWIS by CORNELL, PLUIM, WILEMAN, VARONOS, WESTBROOK, KELETI,
10 THOMAS, and VARGAS.

11 222. For one hearing, LEWIS suffered two heart attacks on his way from Tennessee to
12 California in response to PLUIM'S order to appear.

13 223. At a "meet and confer" on January 16, 2012, MILLER, WILEMAN and JUNCO
14 conspired to verbally assault and abuse NELLE. *See generally*, EXHIBIT 14.

15 224. MILLER admitted to spreading lies and filth about NELLE and LEWIS on at least
16 5,000 sites on the internet, inviting her to sue him if she didn't like it. See EXHIBIT 14, pg.
17 Y [last entry]. By such acts, MILLER intentionally caused destruction of the PAEGEL'S
18 livelihood.

19 225. CORNELL obstructed justice by defaming LEWIS and claiming that he was not a
20 veteran despite having his engraved purple-heart set and veterans I.D. cards, which
21 CORNELL had stolen from LEWIS.

22 226. MILLER and CORNELL conspired to create a Google "Wikipedia listing" of LEWIS
23 giving all of his personal information in such a way as to make it appear to have been put
24 there by LEWIS. CORNELL drew attention to the site on her Facebook page.

25 227. MILLER, KEHOE, COX, HADDOCK and CORNELL exposed the identities and
26 addresses of all of the MINORS on their various and numerous internet sites, ignoring
27 demands for immediate removal.

28 228. MILLER put a map to Plaintiff LORRAINE'S workplace on his HITMAN internet

1 site and blog, intentionally exposing her and two MINORS to predators and causing her to
2 quit her job and move her residence.

3 229. MILLER put a map to Plaintiff LEWIS III'S workplace on his HITMAN internet site
4 and blog, exposing him and his two MINORS to predators.

5 230. CORNELL and COX made a false report about LEWIS III to his employer that
6 resulted in his termination.

7 231. WILEMAN, VARONOS, MILLER, ROBERTS, KELETI, JUNCO, and CORNELL
8 perjured themselves at every hearing they attended. The attorneys representing FIN INST
9 made no in-court statements at all; it was obvious that WILEMAN was selected as the group's
10 "spokesperson." WILEMAN'S false statements in court were tacitly adopted by all
11 Defendants, who were also seen with CORNELL as the center of attention in the hallway
12 outside of PLUIM'S courtroom on September 13, 2012 after NELLE'S withdrawal from her
13 representation.

14 232. KING perjured herself in pleadings submitted by NEWELL, WILEMAN, YAO, and
15 KELETI in state and federal court.

16 233. To impede LEWIS'S investigations, CORNELL perjured herself by claiming that
17 LEWIS committed criminal acts against her and her son, Jack. *See EXHIBIT 15.*

18 234. CORNELL, COX, KEHOE and WESTBROOK tried to obstruct LEWIS'S
19 investigations by deliberately harming LEWIS'S mother, an 82 year old woman with a heart
20 condition.

21 235. CORNELL attempted to murder LEWIS when he wanted his money, laptop computer,
22 and purple-heart set returned.

23 236. WESTBROOK intended to obstruct LEWIS by placing defamatory material about
24 SCOTT on his Facebook page.

25 237. WESTBROOK phoned SCOTT and spoke with LEWIS calling him names and
26 threatening to "ruin him."

27 238. WESTBROOK admitted to speaking with CORNELL, KEHOE, and COX about
28 LEWIS and confirmed that said Defendants conspired to defame LEWIS and harass his

1 mother and son, SCOTT.

2 239. WESTBROOK threatened LEWIS on October 6, 2013.

3 240. LEWIS'S mother received 8 (eight) phone calls from WESTBROOK during the night
4 of October 5, 2013 and left defamatory messages about LEWIS on her phone. Said messages
5 and calls resulted in a complaint being filed with the Sarasota, Fl. County Sheriff's Dept.
6 That Report No. is "13-68164."

7 241. LEWIS'S mother reported that she was "scared to death" and told WESTBROOK to
8 stop calling her, which he ignored.

9 242. WESTBROOK told LEWIS'S mother that he intended to see to it that LEWIS and
10 SCOTT "go to jail." LEWIS'S mother became very upset.

11 243. WESTBROOK, a "gay" man was spurned by SCOTT who had considered rooming
12 with WESTBROOK until SCOTT discovered that WESTBROOK planned on being
13 SCOTT'S "lover." SCOTT is not gay. EXHIBIT 93.

14 244. WESTBROOK was aware of LEWIS'S and LEWIS'S mother's delicate medical
15 condition.

16 245. For damages as a result of this Criminal Scheme, see ¶ 958. *See*

17 **CRIMINAL SCHEMES "A," "B," AND "C" PREDICATE ACTS**

18 246. Each Defendant is liable *directly* or *indirectly* for the entire Criminal Scheme as a
19 member of same, which began as theft of money, property, or other illegal act by
20 GRAMMER, CORNELL, VARONOS, FLEMING, JUNCO, TORO, MILLER, INS, FIN
INST, ROBINSON, JACKSON, MULLIGAN, NIVEN, BEATY, BLEU, WORMLEY,
21 KING, FANGARY, and STELL and ended in the court systems of California, Florida and
22 Tennessee with the *additional* collusive, coordinated and conspiratorial efforts of
23 WILEMAN, KELETI, YAO, KEITH, PLUIM, THOMAS, VARGAS, KEHOE, COX, YAO,
24 HADDOCK, ROBERTS, INS, FIN INST, HAIGHT, WELCH, CAMPION, COLE and
25 SHERMAN, BORRIS, BASLE, SLOUGH, WESLEY, EDMON, KRATTI and GOLDEN.

26 247. For damages as a result of these Criminal Schemes, see ¶ 958.

27 ///

SECOND CAUSE OF ACTION

GRAND THEFT BY FALSE PRETENSES AND FINANCIAL ABUSE OF ELDERLY AND DISABLED asserted by Plaintiffs LEWIS, TBCS, LEWIS III, PAEGELS and DOES 1-300 against Defendants CARMAX, VARONOS, GRAMMER, BLEU, KING, MILLER, FLEMING, TORO, JUNCO, NIVEN, CORNELL, COX, BEATY, PLUIM, VARGAS, THOMAS, WILEMAN, YAO, FIN INST, ROBINSON, ROBERTS, WORMLEY, KEHOE and DOES 1-300.

(The ACTS; Civil RICO; T.C.A. § 39-14-101; T.C.A. § 39-14-103—105; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations; 18 U.S.C. §§ 2261 *et seq.*, 2262, and 2265; Tennessee Adult Protection Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; Fl. Stat. § 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6; T.C.A.71-6-120 *et seq.*)

248. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-247 inclusive of this Complaint as if the same were hereat set forth in full.

249. Demands for return of stolen money, property and information by Defendants have
ALL been completely ignored. EXHIBIT 16.

CRIMINAL SCHEME "A" PREDICATE ACTS:

250. Said Defendants stole money and/or property from said Plaintiffs by making false statements and misrepresentations to or about said Plaintiffs, either directly or indirectly.

251. Plaintiffs LEWIS and/or PAEGELS, directly-or indirectly, entered into agreements with Defendants VARONOS, JACKSON, MULLIGAN, FLEMING, FIN INST, BEATY, ROBINSON, WORMLEY, MILLER, JUNCO, TORO and KING in good faith and in reliance on the perceived honesty of GRAMMER, CORNELL, BLEU and the credentials of KING and NIVEN all of which were asserted under false pretenses.

252. GRAMMER, CORNELL and BLEU were “the celebrities of TODHD” in a charity fundraiser where the donations “disappeared.” *See EXHIBIT 17.*

253. GRAMMER'S actions and the deposition of Gary Arbaugh confirm both the existence of the Criminal Schemes and GRAMMER'S personal involvement in them. Clearly, GRAMMER was an organizer at the highest level.

²⁵⁴ GRAMMER, CORNELL and BLEU were the "faces" on TODHD, STAROPOLY and

1 ESTAR.TV, which were internet schemes to defraud the public and commit large scale credit
2 card and identity theft.

3 255. "Agreements" were initiated directly or indirectly by CORNELL, GRAMMER,
4 JUNCO, TORO, VARONOS, FLEMING, ROBINSON, WORMLEY, FIN INST, TODHD,
5 STAROPOLY, BLEU, BEATY, KING and MILLER with said Plaintiffs and hundreds, if not
6 thousands, of other "victims" under false pretenses to take and permanently deprive all of them of
7 their money and/or property as part of an on-going and evolving series of Criminal Schemes.
8 EXHIBIT 18 is CORNELL'S STAROPOLY sign-up "pitch." EXHIBIT 19 is GRAMMERS',
9 BLEUS', CORNELLS', and FLEMINGS' STAROPOLY sales materials. EXHIBIT 20 is
10 GRAMMER'S conference call reminder. EXHIBIT 21 is HAYELANDS' ad on LinkedIn.
11 EXHIBIT 22 is GRAMMER'S TODHD ad on PRWeb. EXHIBIT 23 is MILLER/HITMAN
12 agreement with TBCS showing his connectedness to KING—same addresses, phones, and
13 advertising. EXHIBIT 24 is the Variety-WILLIAMS-VARONOS/TODHD agreement.
14 EXHIBIT 25 is ROBINSON/MILNER agreement. EXHIBIT 26 is an excerpt of the
15 TORO/GREEN agreement with TBCS. EXHIBIT 27 shows that at the time that JUNCO showed
16 TBCS the video of BLEU advertising MYEZTV, VIEWPARTNER had already abandoned
17 MYEZTV and Gary Arbaugh made clear that the video was false. EXHIBIT 92-J.

18 256. GRAMMER, BLEU and CORNELL all falsely advertised and solicited for the
19 Criminal Schemes fabricated by VARONOS, FLEMING, GRAMMER, KING, BLEU and
20 MILLER under the "business" models: TODHD, STAROPOLY and eSTAR.TV with the
21 specific intent of taking money and property under false pretenses. EXHIBIT 28 is an excerpt
22 taken from MILLER'S on-line advertising campaign for HITMAN marketing services.
23 EXHIBIT 29 is the VIEWPARTNER'S agreement drafted for TBCS with TODHD.
24 EXHIBIT 30 is an excerpt from eSTAR.TV agreement. EXHIBIT 31 consists of ad pieces by
25 VARONOS and FLEMING.

26 257. Said Defendants specifically intended that Plaintiffs and others would rely on the
27 perceived integrity and tacit protections against fraud of the FIN INST and GRAMMER,
28 BLEU, CORNELL, NIVEN and KING; the participation of these Defendants was material to

1 making their business decisions in this matter.

2 258. None of said Defendants took any action to cease their illegal advertising and support
3 from TODHD, STAROPOLY and ESTAR.TV despite their having direct knowledge that they
4 were involved with illegal schemes. Clearly, said Defendants are members of the same
5 Criminal Scheme.

6 259. On December 4, 2010, PAEGELS/TBCS videotaped EVENT such as the red carpet,
7 rehearsal, show, and back stage interviews for their use that were stolen by MILLER and
8 KING. EXHIBIT 49.

9 260. At Nuke The Fridge Con, PAEGELS/TBCS videotaped presentations for their use that
10 MILLER stole under false pretenses and subsequently offered them for sale on the internet.
11 EXHIBIT 58.

12 261. Said Plaintiffs PAEGELS and TBCS were not hired or compensated by anyone to
13 videotape the productions; all taping was for the express purpose of benefitting
14 PAEGELS/TBCS.

15 262. Through trickery and false promises, CORNELL, VARONOS, NIVEN, KING,
16 FLEMING, and MILLER stole TBCS/PAEGEL'S money and property—21 videotapes of the
17 Variety Power of Comedy Event (“EVENT”) that included rehearsals, program, back stage
18 interviews with celebrity comedians, and red carpet “step and repeat” interviews. A constructive
19 trust was created between TBCS/PAEGELS with said Defendants that Defendants violated.

20 263. CORNELL, VARONOS, KING, FLEMING, TODHD and MILLER stole
21 TBCS/PAEGEL'S services by tricking TBCS/PAEGELS into supplying the labor, supplies,
22 and equipment to film the “step and repeat,” the EVENT itself, and the back-stage interviews,
23 which Defendants MILLER and KING personally took under false pretenses and kept them
24 permanently.

25 264. CORNELL told PAEGELS that if they didn't willingly give MILLER and KING the
26 tapes of the EVENT, MILLER would take them by force, indicating that MILLER had a gun.

27 265. MILLER, KING, and CORNELL, took the tapes through trickery promising to
28 “digitize” and return them the following week. EXHIBIT 32. They took the tapes with the

1 intent of keeping them permanently and they have done so.

266. VARONOS intended to defraud Brian Williams and Variety Magazine at the time the
2 advertising agreement was signed. VARONOS signed the contract with Variety whereby
3 TODHD would receive numerous advertising benefits from Variety in exchange for a tax
4 deductible donation to the foundation. VARONOS breached that agreement by failing to pay
5 the sponsorship fee, \$100,000.00—however, TODHD, GRAMMER and CORNELL all
6 received the benefits of said advertising and still do. EXHIBIT 33-A & B is a full-page
7 Variety ad dated Dec. 3, 2010; EXHIBIT 33- C & D show that TSOFTNET, GRAMMER and
8 CORNELL continued to take advantage of the free advertising.

267. On December 30, 2009, JUNCO and TORO “sold” TBCS a TODHD sub-channel
under false pretenses. TBCS/PAEGELS paid said Defendants seventy-seven thousand five
hundred forty-six dollars and sixty-two cents dollars (\$77,546.62) toward a two hundred and
fifty thousand dollar (\$250,000) contract before learning the truth.

268. Unbeknownst to TBCS, the sub-channel capability did not exist at the time of said
Agreement and TORO and JUNCO committed grand theft under false pretenses for
fraudulently selling something that did not exist. TBCS did not know for nearly a year
thereafter that TODHD itself was a Criminal Scheme for the sole purpose of committing theft
under false pretenses by GRAMMER, CORNELL, BLEU, VARONOS, FLEMING, JUNCO,
MILLER, KING, and TORO.

269. GRAMMER, CORNELL and BLEU intended to induce victims into investing in
multiple Criminal Schemes by being the PRIMARY “face” of the TODHD “network of
channels,” on STAROPOLY, and eSTAR. All of the schemes consisted of nothing more than
artwork created by FLEMING, GRAMMER’S close personal friend. There were never any
actual businesses that BLEU, CORNELL and GRAMMER promoted and endorsed.

270. BLEU was featured on the **promotional video** demonstrating the alleged
“technological wonders of TODHD” (then MYZTV). Said video was shown to
TBCS/PAEGELS by JUNCO.

271. Defendants, VARONOS and FLEMING further induced Plaintiffs to invest in

1 TODHD by falsely listing the well-known television networks: Kelseylive, Lydialive, ABC,
2 CBS, NBC, CNN, BBC, ESPN and others on the TODHD channel guide in order to give the
3 impression that these well-known networks were already clients of TODHD. These
4 representations as to ABC, CBS, NBC, CNN, BBC, and ESPN were completely false as none
5 of the major networks were ever affiliated with TODHD. EXHIBIT 34 is the channel guide
6 used by GRAMMER, VARONOS, BLEU and FLEMING to "lure" investors and the public.

7 272. In mid-June, 2010, Defendants VARONOS and FLEMING scheduled a meeting with
8 TBCS owners, for the first time, at D.G. Entertainment, a well-known film and recording
9 studio in Los Angeles, California, to discuss terms of a new channel for them. FLEMING
10 represented TODHD and introduced himself and MILLER at the meeting. MILLER showed
11 the PAEGELS photos of his "stable of clients" from his Ipad. All representations were false.

12 273. Soon thereafter, Plaintiff TBCS reached an agreement to pay Defendant VARONOS a
13 one-time channel fee of ten thousand dollars (\$10,000.00) plus monthly fees of one thousand
14 dollars (\$1,000.00) per month plus "bandwidth use" for their channel. The money was
15 deposited directly to a FARGO account.

16 274. FLEMING did artwork for TBCS'S "channel." The money was directly deposited to
17 a FARGO account.

18 275. Payments of \$23,000.00 were made into FARGO account numbers given to
19 TBCS/PAEGELS by VARONOS and FLEMING.

20 276. BEATY and MERITUS processed credit/debit cards for STAROPOLY Associates as
21 a "registered ISO/MSP of Wells Fargo Bank, NA 1209." MERITUS is not registered with the
22 California Secretary of State. EXHIBIT 35-A. BEATYS' E-mail is dated 9/17/10 however,
23 STAROPOLY was revoked as a business entity by the Nevada Secretary of State on 8/31/10.
24 See EXHIBIT 35-B. See also, BEATY'S e-mail and attached MERITUS application sent
25 subsequent to STAROPOLY'S revocation. EXHIBIT 35-G incorporates all FIN INST in the
26 Criminal Scheme.

27 277. MILLER pursued an agreement with TBCS to act as its public relations "specialist"
28 for the supposed purpose of getting programming for, and aired, on their TODHD channel.

8 279. TBCS/PAEGELS paid MILLER \$43,000 before learning that he had lied about
9 everything; the meeting staged with FLEMING was a farce, because HITMAN was nothing
10 more than a web page pretending to promote a real business and MILLER had no stable of
11 clients or public relations skills. MILLER subsequently admitted that HITMAN was just a
12 “webpage.”

13. 280. MILLER believed that although he stole Plaintiffs valuable property, breached his
14. agreement, and never performed any part of his promises or services Plaintiffs should
15. continue paying him on a contract that was void *ab initio* and further attempted to extort more
16. money from them. MILLER retaliated for refusing to pay his extortion by defaming NELLE
17. as an attorney on 5,000 websites, filing false reports about NELLE with the Walnut Sheriff
18. Dept., the Glendora Police Dept. twice with the California State Bar, and flooded the internet
19. with filth and lies about all of the PAEGELS, but most specifically about NELLE. He also
20. hacked into the PAEGEL'S computer.

21 281. MILLER conspired with other members of the Criminal Scheme to hack into
22 Plaintiffs' e-mails, government databases, and social media networking sites including but not
23 limited to Facebook, Linked-In, and Twitter.

24 282. MILLER listed his business address as 375 Huntington Drive, Ste. B, San Marino,
25 California. This office was in reality KING'S chiropractic address. KING knew of
26 MILLER'S use of her address for the purpose of giving a false impression. KING and
27 MILLER testified that MILLER merely "rented" her business address, however neither can
28 supply proof of same.

- 1 283. MILLER has no marketable public relations skills; his sole purpose is to cheat people
2 of money and property with no return to them.
- 3 284. The material taped at the Variety EVENT was done exclusively by the Plaintiffs
4 PAEGELS and TBCS; there is no question as to their ownership of it. Together at the end of
5 the EVENT, MILLER and KING stole the material, taking it under false pretenses because
6 VARONOS, who was also there, said he needed the tapes to be digitized for "use on TBCS
7 channel." Because the channel had no such capability, together CORNELL, VARONOS,
8 MILLER and KING all conspired to concoct a story by which they could steal the material
9 from the hands of the PAEGELS. CORNELL even told the PAEGELS that MILLER had a
10 pistol in his waistband if they resisted in handing over the tapes.
- 11 285. On or about November 15, 2010, VARONOS had already planned to give copies of
12 the EVENT videos to the skin-care company, Pure Chemistry, in exchange for satisfying the
13 "gift bag" term of the Variety/TODHD Agreement showing that his "intent" to put the
14 material on TBCS'S channel was made under false pretenses.
- 15 286. CORNELL, claiming to have been defrauded by MILLER, VARONOS, and
16 FLEMING was included as a plaintiff in the GC047909 LASC suit. In actuality, CORNELL
17 was a member of the Criminal Scheme concocting a story for the purpose of becoming an
18 "informer" for the defense.
- 19 287. CORNELL continued to fraudulently advertise her "work" at the EVENT, deriving
20 continued benefit from the Criminal Scheme to defraud Variety.
- 21 288. CORNELL attempted to involve LEWIS in several of her Criminal Schemes, which
22 LEWIS rejected. Since then, CORNELL has stalked LEWIS mercilessly and enlisted others,
23 such as WESTBROOK, WALSH, and FORD to do the same.
- 24 289. CORNELL and HAYELAND have a history of fraud and theft. Between the years
25 2001-2006, CORNELL and HAYELAND were investigated by the Los Angeles Police Dept.
26 individually and together in a fraud and theft scheme. EXHIBIT 36 is the front page news
27 story describing how CORNELL and HAYELAND stole \$300,000.00 and a Los Angeles
28 residence valued at \$750.000.00 from the rightful beneficiary to the estate that HAYELAND

1 administered. EXHIBIT 36.

2 290. JUNCO, TORO, ROBINSON, WORMLEY, MILLER, KING, FLEMING and
3 VARONOS have ignored TBCS/ PAEGEL demands to return their videotapes and money
4 taken under false pretenses.

5 291. MILLER attempted to extort an additional \$20,158.16 [400% interest] by threatening
6 to file complaints and reports to credit bureaus despite that his small claims case was
7 dismissed without prejudice to take it to arbitration. EXHIBIT 37-A, B & D.

8 292. GRAMMER personally telephoned LEWIS, at CORNELL'S request, to talk LEWIS
9 into becoming a STAROPOLY "associate." Later, after LEWIS became suspicious about the
10 efficacy of STAROPOLY, GRAMMER refused to speak with him.

11 293. CORNELL stole \$3,666.00 from LEWIS under false pretenses that it was a "loan" to
12 be paid back within three (3) months. Her intent was always to steal the money.

13 294. SIMMONS and HAYELAND sold items via the internet from GSAXE, AXE LTD,
14 and SIE sites.

15 295. A charity fundraiser was advertised and occurred in July 2010. GRAMMER is the
16 only member affiliated with TODHD and STAROPOLY known to own a charitable company.
17 The funds raised disappeared and were never distributed according to the promise made.

18 296. All said Defendants participated directly or indirectly in Criminal Scheme A.

19 297. HAIGHT, STELL and CAMPION conspired to deprive the rightful heirs of their
20 \$250,000.00 inheritance.

21 298. STELL committed the federal crime of interstate transportation of stolen property by
22 claiming a retirement account located in Illinois and transporting it through the mail to Texas.
23 STELL perjured himself in order to take the account valued at \$44,000.00. EXHIBIT 81.

24 299. CAMPION and STELL conspired to cover-up the theft by false pretenses. CAMPION
25 denied that this account was in existence; heirs had to obtain proof through a subpoena in
26 order to learn the truth. CAMPION breached his fiduciary duty to the heirs many times and
27 ultimately the heirs suffered a total loss of the estate through the collusion of STELL and
28 CAMPION.

- 1 300. HAIGHT and WELCH refused to enforce subpoenas for information and motions to
2 compel discovery. One heir could not even receive proof of her own mother's insurance
3 proceeds owing to the collusion by HAIGHT, CAMPION and STELL.
- 4 301. BASLE and SLOUGH failed to properly track and supervise WELCH and HAIGHT.
- 5 302. CARMAX defrauded PAEGELS by overcharging for their automobile loan.
- 6 303. For damages as a result of this Criminal Scheme, see ¶ 958.

7 CRIMINAL SCHEME "B" PREDICATE ACTS:

- 8 304. MILLER financially abused NELLE and TOM in violation of California Welfare laws
9 by his actions to destroy NELLE'S career and try to get her disbarred and arrested.
- 10 305. INS, WILEMAN, YAO, KELETI, CORNELL, MILLER, KING, JUNCO, TORO,
11 FIN INST, PLUIM, THOMAS, VARGAS, VARONOS, ROBERTS, NEWELL, and FIN
12 INST conspired to corrupt the judicial system costing LEWIS, TBCS/PAEGELS and
13 WILLIAMS the value of litigation in GC047909, which exceeded \$100,000,000.00.
- 14 306. CORNELL organized meetings to discuss the legal bases for initiating case no.
15 GC047909 at her home. Unbeknownst to the PAEGELS, CORNELL also invited COX and
16 other members of the Criminal Scheme whose sole purpose was to discourage filing that suit.
17 At the same meeting, one of the members of the Criminal Scheme tried to sell Plaintiffs on
18 yet another Scheme, located in Japan.
- 19 307. CORNELL'S purpose in being a plaintiff in case GC047909 was to inform the other
20 members of the Criminal Scheme about Plaintiffs' activities, strategies, and to gather
21 information for the defendants. CORNELL defrauded plaintiffs by stealing money, time, and
22 litigation strategies under false pretenses; she finally admitted to same.
- 23 308. All but three defendants were in default on the \$100,000,000.00 suit September 14,
24 2011, yet PLUIM, VARGAS, and THOMAS saw to it that the defendants were ultimately
25 dismissed in January, 2012.
- 26 309. WILEMAN was allowed to repeatedly clog the docket with unnecessary pleadings and
27 hearings knowing that—owing to court reporters being terminated by LASC—that plaintiffs
28 would be forced to—and did—personally hire a court reporter in order to have any record of

1 the travesties that occurred there. PLUIM denied NELLE'S requests to consolidate hearings.

2 310. PLUIM ignored all or nearly all of LEWIS'S and NELLE pleadings; he failed to rule
3 on most of their motions and petitions. In fact, from the transcripts it was apparent that
4 PLUIM never knew specifically the contents of any pleading he did rule on; he merely denied
5 all plaintiffs requests and motions and granted all of defendants' requests and motions.

6 311. KRATTI, WESLEY and EDMON failed to properly advise and supervise PLUIM.

7 312. For damages as a result of this Criminal Scheme, see ¶ 958.

8 **CRIMINAL SCHEME "C" PREDICATE ACTS:**

9 313. PLUIM, THOMAS, and VARGAS had sheriffs stand behind LEWIS and NELLE at
10 hearing to intimidate them and cause emotional distress.

11 314. PLUIM, THOMAS, and VARGAS forced LEWIS and NELLE to appear at hearings
12 in person by disallowing him to participate in hearings via CourtCall.

13 315. PLUIM, THOMAS, and VARGAS knew that LEWIS was not allowed to travel—
14 having received three notes from LEWIS' physicians.

15 316. PLUIM ordered LEWIS to get out of his courtroom and never return.

16 317. PLUIM allowed WILEMAN to harass LEWIS in the hope that LEWIS would cease
17 investigating them and clerks THOMAS and VARGAS.

18 318. PLUIM, THOMAS and VARGAS acted in a manner that constituted self-dealing by
19 sabotaging plaintiffs case against themselves and WILEMAN in the SUPPLEMENT filed by
20 LEWIS. EXHIBIT 1.

21 319. By spying on her fellow plaintiffs for the defendants, CORNELL undermined their
22 case, which exponentially increased the costs and fees.

23 320. For damages as a result of this Criminal Scheme, see ¶ 958.

24 **THIRD CAUSE OF ACTION**

25 **CIVIL CONSPIRACY UNDER RICO asserted by ALL PLAINTIFFS and DOE Plaintiffs 1-**
26 **300 against ALL DEFENDANTS and DOE Defendants 1-300 Inclusive.**

27 (The ACTS; RICO; Hobbs Act; The Identity Theft Enforcement and Restitution Act of 2008,
28 18 U.S.C. §1030; T.C.A. § 39-12-201 et seq.; Moneylaundering T.C.A. § 39-14-903 et seq.; Gangs
ACT; Tennessee Adult Protection Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz.

1 Revised Stat. §46-455; Fl. Stat. § 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca.
2 Code of Civ. Proc. § 527.6; T.C.A.71-6-120 et seq. Tenn. Adult Protection Act.)

3 321. By this reference, LEWIS herein incorporates each and every allegation of the
4 foregoing paragraphs 1-320 inclusive of this Complaint as if the same were hereat set forth in
full.

5 **CRIMINAL SCHEME "A" PREDICATE ACTS:**

6 322. CARMAX and FARGO conspired to get LEWIS arrested.

7 323. JUNCO, TORO, VARONOS, FLEMING, MILLER, KING, VARONOS, JACKSON,
8 MULLIGAN, GRAMMER, ROBINSON, BEATY, BLEU, ROBERTS, SIMMONS,
9 WORMLEY, FIN INST, INS, CORNELL, NIVEN, HAYELAND, NIVEN, KEITH, and
10 COX conspired to endanger MINORS and defraud Plaintiffs and the public at large of money,
11 property, and credit card information.

12 324. HAIGHT, WELCH, SHERMAN, COLE, PLUIM, THOMAS, VARGAS,
13 WILEMAN, KELETI, YAO, NEWELL, BASSE, GOLDEN, KRATTI, BORRIS, WESLEY,
14 SLOUGH, FANGARY, ROBERTS, SCHWARTZ, B.H.P.D., BAC, and CAMPION
15 conspired to subvert state and federal laws, the U.S. Constitution and the rules of ethics to
16 knowingly corrupt the justice system as members of one or more Criminal Schemes.

17 325. HADDOCK, KEHOE and CORNELL conspired to endanger the safety of MINORS
18 by putting their names and maps to their homes on the internet.

19 326. WILEMAN, PLUIM, KELETI, THOMAS, VARGAS, WALSH and FORD conspired
20 with CORNELL to threaten and defame LEWIS on the internet.

21 327. STELL, CAMPION, WELCH and HAIGHT conspired to deprive heirs of their money
22 and property.

23 328. FIN INST conspired with BEATY, VARONOS and FLEMING in furtherance of their
24 Criminal Schemes.

25 329. CORNELL and HAYELAND conspired to embezzle property and money from the
26 rightful beneficiary of an estate.

27 330. WESTBROOK threatened to "ruin" LEWIS and told him "I hope you die of your
28 Leukemia too." The only means by which WESTBROOK could have known about LEWIS'S

1 medical condition is from CORNELL, COX and KEHOE.

2 331. WESTBROOK admitted to getting LEWIS'S mother's phone number from KEHOE.

3 332. For damages as a result of this Criminal Scheme, see ¶ 958.

4 **CRIMINAL SCHEME "B" PREDICATE ACTS:**

5 333. WILEMAN, ALMEIDA, MILLER, KING, NEWELL, JUNCO, TORO, PLUIM,
6 THOMAS, VARGAS, KELETI, YAO, CORNELL, VARONOS, FIN INST, and INS
7 conspired to get case no GC047909 dismissed in its entirety through perjury and subversion.

8 334. WILEMAN has a well-established pattern for misleading courts by twisting and
9 abjectly misstating law and facts. PLUIM, THOMAS, VARGAS, MILLER, KING,
10 NEWELL, VARONOS, ROBERTS, YAO, KELETI and INS conspired with WILEMAN to
11 continue—and blindly accept—that conduct. EXHIBIT 5.

12 335. PLUIM, THOMAS, VARGAS, MILLER, KING, VARONOS, WILEMAN, YAO,
13 KELETI, ALMEIDA, NEWELL and INS conspired to have KING dismissed as a Defendant
14 despite that she was already in default.

15 336. PLUIM, WILEMAN, YAO and MILLER conspired to defame NELLE.

16 337. MILLER, KING, NEWELL, WILEMAN, ALMEIDA, YAO, KELETI and INS
17 conspired to commit insurance bad faith and fraud.

18 338. MILLER, WILEMAN and JUNCO conspired to verbally assault NELLE PAEGEL.

19 339. INS conspired with WILEMAN, YAO, KING, and KELETI by giving false
20 information.

21 340. For damages as a result of this Criminal Scheme, see ¶ 958.

22 **CRIMINAL SCHEME "C" PREDICATE ACTS:**

23 341. CORNELL, MILLER, WILEMAN, GRAMMER, INS, KING, PLUIM, THOMAS,
24 VARGAS, VARONOS, KRATTI, EDMON, FIN INST, and KELETI conspired against
25 LEWIS to have him removed as a plaintiff, arrested without bail, his life endangered, and the
26 Supplement dismissed without cause and in derogation of federal law, the U.S. Constitution,
27 and the rules.

28 342. WILEMAN, WALSH, FORD, CORNELL, COX, KEITH, KEHOE, MILLER and

1 HADDOCK conspired to threaten and defame LEWIS.

2 343. WILEMAN, CORNELL, COX, KEITH, KEHOE, MILLER and HADDOCK
3 conspired to endanger the lives and livelihood of LEWIS, LEWIS III, LORRAINE and
4 MINORS via the internet.

5 344. MILLER, KING, GRAMMER, VARONOS, WILEMAN, PLUIM, CORNELL, COX,
6 KEHOE, KEITH, HADDOCK, THOMAS, NEWELL, YAO, KELETI, VARGAS and
7 ROBERTS conspired to harass, intimidate, threaten, defame, commit perjury and cause severe
8 emotional and physical distress to LEWIS, LEWIS III, LORRAINE, and the PAEGELS.

9 345. WESTBROOK, CORNELL, KEHOE, and COX conspired to deliberately harm
10 LEWIS'S mother.

11 346. For damages as a result of this Criminal Scheme, see ¶ 958.

12 FOURTH CAUSE OF ACTION

13 EXTORTION/ATTEMPTED EXTORTION & BLACKMAIL asserted by Plaintiffs LEWIS,
14 LEWIS III, LORRAINE, MINORS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against
15 Defendants MILLER, CORNELL, COX, KEHOE, GRAMMER, PLUIM, WILEMAN, KING,
INS, THOMAS, VARGAS and DOE Defendants 1-300 Inclusive.

16 (The ACTS; CIVIL RICO; Tennessee Code 39-14-112, and 106 (2007); The Identity Theft
17 Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations; Tennessee Adult
18 Protection Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; FL
Stat. § 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6;
19 T.C.A.71-6-120 et seq. Tenn. Adult Protection Act.)

20 347. By this reference, LEWIS herein incorporates each and every allegation of the
21 foregoing paragraphs 1-346 inclusive of this Complaint as if the same were hereat set forth in
22 full.

23 CRIMINAL SCHEME "A" PREDICATE ACTS:

24 348. More than once, MILLER attempted to extort money from the PAEGELS in exchange
25 for getting their own property back. EXHIBIT 37 shows that following PLUIM'S dismissal
26 of MILLER'S small claims action against the PAEGELS, MILLER continued to extort
money—an outrageous amount—in exchange for their own property.

27 349. MILLER attempted to extort money from the PAEGELS through threats to their

1 credit.

2 350. MILLER attempted to blackmail NELLE by threatening to file a bar complaint against
3 her despite that NELLE had never done any legal work for him or violated any ethics rule.

4 351. MILLER retaliated against NELLE for refusing to submit to his extortions and
5 blackmail by filing bar complaints, police and sheriff complaints, and by defaming NELLE as
6 an attorney on 5,000 websites and press releases. See EXHIBIT 38 for an example of same.

7 352. MILLER used extortion in an attempt to coerce NELLE into giving up the lawsuit
8 through methods commonly used by members of the Criminal Scheme.

9 353. Hoping LEWIS would cease investigating her as the PAG of his Supplement,
10 CORNELL instigated a true "hate" and defamation campaign against LEWIS in collusion
11 with MILLER, WILEMAN, KELETI, PLUIM, THOMAS, VARGAS, FIN INST, INS,
12 COLE, KRATTI, EDMON, WESLEY, WALSH, FORD, KEHOE and COX to cause LEWIS
13 extreme bodily harm. LEWIS suffered two heart attacks on his way from Tennessee to
14 California for a hearing.

15 354. PLUIM conspired with MILLER to defame NELLE by refusing to hear NELLE'S
16 objections to MILLER'S false in-court statements on October 14, 2011. EXHIBIT 2-J thru L.

17 355. CORNELL attempted to extort LEWIS by engaging in on-line, in-court, and
18 telephonic attacks on LEWIS'S character and reputation.

19 356. CORNELL presented a "contract" to LEWIS in which she wanted him to agree to gift
20 her 50% of his litigation "proceeds." In retaliation for LEWIS'S refusal to sign said
21 "contract," CORNELL defamed and endangered the lives of LEWIS, LEWIS III, SCOTT,
22 LORRAINE, and MINORS and made numerous defamatory statements about LEWIS.

23 357. CORNELL, COX and MILLER caused LEWIS III and LORRAINE to lose or quit
24 their jobs by putting their private information over the internet and by calling their employers.
25 LEWIS III'S employers, FEMA and Albert Shipova, were contacted by Defendants; the direct
26 result of the contact was to terminate LEWIS III'S employment. LEWIS III'S FEMA card
27 was cancelled for the sole purpose of extortion against LEWIS.

28 358. Similarly, a woman claiming to be a reporter with the Los Angeles Times Newspaper

1 called—several times—the workplace of LORRAINE. That newspaper's city desk denied
2 any such contacts. Organized crime commonly attacks the family members of resistant
3 extortion “targets.” LORRAINE was forced to move her residence and quit her job as a direct
4 result of said Defendants' actions.

5 359. CORNELL created and distributed a false profile of LEWIS and distributed it as
6 “factual” over the internet and to WILEMAN, MILLER, COX, KEHOE, HADDOCK, COLE,
7 WALSH, FORD, SCHWARTZ, PLUIM, THOMAS, VARGAS, the F.B.I. and other law
8 enforcement agencies. All said Defendants used the profile to further defame LEWIS and
9 deprive him of his civil rights. The profile contained a photo that was *not* of LEWIS,
10 however, which detracted from its authenticity. To correct this defect, FARGO—in
11 furtherance of the Criminal Schemes—filed a false police report against LEWIS on an
12 automobile loan that was paid in full in order to get him arrested; the result of the arrest was
13 to obtain a true photo of LEWIS, which said Defendants used to create another false profile of
14 LEWIS. EXHIBITS 59 and 64.

15 360. SCHWARTZ e-mailed the second false profile to NELLE. EXHIBIT 59. NELLE
16 receive no response from SCHWARTZ or B.H.P.D. for this invasion of her privacy and
17 defamation of LEWIS.

18 361. CORNELL further retaliated against LEWIS by filing two false petitions for
19 restraining orders in an attempt to prevent LEWIS'S investigations. The court first granted
20 mutual restraining orders, however COLE later changed it to only prejudice LEWIS,
21 knowingly violating his civil rights.

22 362. WESTBROOK extorted SCOTT and LEWIS when he posted defamatory messages
23 over the internet in trying to get SCOTT to become his gay lover. EXHIBIT 93.

24 363. For damages as a result of this Criminal Scheme, see ¶ 958.

25 **CRIMINAL SCHEME “C” PREDICATE ACTS:**

26 364. As a result of CORNELL'S illegal actions, LEWIS named her as a Defendant in his
27 Supplement. CORNELL impeded LEWIS'S Civil RICO investigation. CORNELL tried to
28 blackmail LEWIS into quitting his investigations by falsely stating on the internet and in

courts that LEWIS threatened to kill her and her son on July 29th 2012.

365. At that time, LEWIS realized that CORNELL was actually a "ringleader" in the Criminal Scheme.

366. CORNELL'S falsities about LEWIS and his family were distributed by MILLER, WILEMAN, SCHWARTZ, KELETI, COX, KEHOE, WESTBROOK, WALSH, and FORD.

367. CORNELL and FORD conspired to blackmail LEWIS via a phone call in the middle of the night.

368. FORD admitted to LEWIS that he was affiliated with "organized crime."

369. For damages as a result of this Criminal Scheme, see ¶ 958.

FIFTH CAUSE OF ACTION

CREDIT/DEBIT CARD FRAUD and PHISHING asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against Defendants VARONOS, GRAMMER, BLEU, KING, MILLER, FLEMING, JACKSON, SCHWARTZ, B.H.P.D., MULLIGAN, HAYELAND, CORNELL, BEATY, FIN INST, SIMMONS, TODHD, PLUIM and DOE Defendants 1-300 Inclusive.

(The ACTS; CIVIL RICO; Tenn. Code Ann. § 39-14-118; Tenn. Code Ann. § 39-14-102(2); Tenn. Code Ann. § 39-14-102(3); Tenn. Code Ann. § 39-11-106(a)(9); Tenn. Code Ann. § 39-11-106(a)(26); Tenn. Code Ann. § 39-14-102(5); Tenn. Code Ann. § 39-11-106(a)(20); Tenn. Code Ann. § 39-11-301(a)(2); Tenn. Code Ann. § 39-11-106(a)(18); Tenn. Code Ann. § 39-11-106(a)(28); Tenn. Code Ann. § 39-11-106(a)(34); Tenn. Code Ann. § 39-14-102(10); Tenn. Code Ann. § 39-14-102(4); Tenn. Code Ann. § 39-11-106(a)(13); Tenn. Code Ann. § 39-14-105; Tenn. Code Ann. § 39-14-118(c)(1); Tenn. Code Ann. § 39-14-118(c)(2); T.P.I. -- Crim. 4.01 (Attempt))

370. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-369 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS:

371. Said Defendants conspired with each other to defraud hundreds, if not thousands, of
“victims” of their money through the fraudulent use of credit/debit cards, directly or
indirectly.

372. Becoming an "Associate" of STAROPOLY involved giving certain private information and payment of fees via credit or debit card; said fees were charged initially and

1 monthly. EXHIBIT 39. FIN INST processed the credit cards.

2 373. Money that an Associate earned via STAROPOLY was to be credited to them on a
3 Payoneer card issued by MC. EXHIBIT 40.

4 374. No Associate received credits. EXHIBIT 41 shows commissions being "held."

5 375. Credit card charges continued even after an Associate resigned from STAROPOLY.
6 BEATY and FIN INST failed to disclose the terms of the charges.

7 376. FIN INST took receipt of the money that was fraudulently taken by said Defendants.

8 377. During an abusive tirade, MILLER tried to force PAEGELS to pay him money via
9 credit card through KING'S processor.

10 378. Also, MILLER tried to get NELLE/TBCS to pay for artwork MILLER ordered from a
11 Russian National, Nickolay Zdanevich, through Payoneer, moneybookers.com or
12 westernunion.com. EXHIBIT 42.

13 379. The artwork was paid for via western union, however TBCS/PAEGELS never
14 received it from either the Russian or from MILLER.

15 380. When SCHWARTZ and the City of Beverly Hills was confronted about sending a
16 defamatory e-mail to NELLE about LEWIS, the City called the e-mail the result of Phishing.
17 However, a second demand from NELLE to B.H.P.D. and SCHWARTZ resulted in a false
18 warrant for LEWIS'S arrest. EXHIBIT 76.

19 381. For damages as a result of this Criminal Scheme, see ¶ 958.

20 **CRIMINAL SCHEME "B" PREDICATE ACTS:**

21 382. PLUIM used his position as a judge in the LASC court system to protect those who
22 committed the credit card fraud when he dismissed GC047909 against FIN INST, and those
23 Defendants who were behind the credit card fraud, VARONOS, FLEMING, GRAMMER,
24 BLEU, CORNELL, KING, and MILLER without any justification.

25 383. For damages as a result of this Criminal Scheme, see ¶ 958.

26 ///

27 ///

28 ///

SIXTH CAUSE OF ACTION

CHILD ENDANGERMENT AND CHILD ABUSE asserted by Plaintiffs LEWIS, LORRAINE, LEWIS III, MINORS and DOE Plaintiffs 1-300 against CORNELL, COX, KEHOE, MILLER, PLUIM, THOMAS, VARGAS, WILEMAN, HADDOCK, KEITH and DOE Defendants 1-300 Inclusive.

(42 USC 17601, et seq.; ICAC Program; 42 U.S.C.A. § 5106 (g); The Child Safety Act of 2005, HR 3132; The Adam Walsh Child Protection and Safety Act of 2006 HR 4472 (109th, 2005-2006) (Mandated by federal authorities) and The Protect Act of 2003, 18 U.S.C. 2252 (B) (b); The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030, TCA 39-15-401; T.C.A. § 39-15-401 et seq; T.C.A. §39-15-101.)

384. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-383 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "C" PREDICATE ACTS:

385. To "impede" LEWIS, the health, safety, and welfare of MINORS were endangered by CORNELL, COX, KEHOE, MILLER, PLUIM, THOMAS, VARGAS, WILEMAN, HADDOCK, and KEITH who placed, directly or indirectly, private information about them on numerous internet sites.

386. The MINORS were harmed as part of the conspiracy to harass and attempt to extort LEWIS.

387. HADDOCK abducted two of the MINORS from their custodial parent, LORRAINE; HADDOCK gave LORRAINE a false address as to where the children could be found. For several months, LORRAINE had no idea where—or if—her children were even alive.

388. HADDOCK was motivated by wishing to avoid paying child support and to take possession of the social security funds received by MINOR 2, who is disabled, which he used for his own purposes and not for the needs of MINOR 2.

389. HADDOCK abused MINORS 1 and 2 by forcing them to sleep on furniture, instead of
in a bed.

390. HADDOCK abused MINORS 1 and 2 by failing to provide them with minimum clothing, such as school shoes.

391. CORNELL, HADDOCK, and KEHOE supplied their co-conspirators, MILLER,

1 COX, and KEITH, with all of the particular personal information that appeared on their sites.

2 392. PLUIM, THOMAS and VARGAS used and abused judicial authority to excuse
3 those responsible for endangering MINORS by dismissing LEWIS'S Supplement, because it
4 named them as defendants.

5 393. CORNELL ignored LORRAINE'S pleas that she "cease and desist" placing
6 objectionable material on the internet.

7 394. HADDOCK and KEHOE forced MINORS 1 and 2 to lie about LORRAINE and her
8 fiancé.

9 395. For damages as a result of this Criminal Scheme, see ¶ 958.

10 **SEVENTH CAUSE OF ACTION**

11 **ILLEGAL PRACTICE OF BUSINESS AND FALSE ADVERTISING** asserted by Plaintiffs
12 LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against Defendants FIN INST, BEATY,
13 BLEU, CORNELL, COX, JUNCO, TORO, FLEMING, GRAMMER, HAYELAND,
14 JACKSON, KING, MILLER, MULLIGAN, NIVEN, ROBINSON, VARONOS, WORMLEY,
ALMEIDA, COLE, KEHOE, KING, KEITH, WILEMAN, YAO, KELETLI, INS, and DOE
Defendants 1-300 Inclusive.

15 (T.C.A. § 39-14-127; T.C.A. § 39-14-127; §47-18-104; Uniform Deceptive Trade Practices Act
16 No. §47-18-101 et seq.; Tennessee Consumer Protection Act of 1977 § 47-18-104; FL statute for
caregiving § 39.5085(2)(f) and other FAC statutes for caregiving/caregivers; Federal Trade
17 Commission Act ("FTC") Regulations, the Clayton Act; The ACTS; CIVIL RICO;
Commissioner of Health and Human Resources.)

18 396. By this reference, LEWIS herein incorporates each and every allegation of the
19 foregoing paragraphs 1-395 inclusive of this Complaint as if the same were hereat set forth in
20 full.

21 **CRIMINAL SCHEME "A" PREDICATE ACTS**

22 397. Said Defendants deceptively represented themselves and others in the Criminal
Scheme in commerce, both in person and on the WEB, via "fake" commercial concerns. See
23 EXHIBITS 43-44, 81, 87-92.

24 398. CORNELL, MILLER, KING, VARONOS, FLEMING, GRAMMER, BLEU,
ROBINSON, JACKSON, MULLIGAN, WORMLEY, KING, TORO, JUNCO, and NIVEN
25 falsely advertised and/or made false representations to the public at large and Plaintiffs TBCS

1 and PAEGELS in particular that TODHD was “the first branded social media entertainment
2 network” having “revolutionary technology” and offering programming and merchandising
3 opportunities.

4 399. On July 19, 2012, HITMAN/MILLER released a PRLOG about KING’S Cavi-Lipo
5 Device that falsely implied that Cavi-Lipo endorsed KING. EXHIBIT 43.

6 400. FLEMING was the “Chief Design Operator” for TODHD, STAROPOLY, and
7 ESTAR. EXHIBIT 31-A.

8 401. Because the Criminal Schemes of TODHD, STAROPOLY, and ESTAR consist of
9 ONLY artwork on the internet, FLEMING is construed as the “master creator” of them.

10 402. FLEMING is a close personal friend of GRAMMER, CORNELL, HAYELAND,
11 MILLER, VARONOS, and SIMMONS.

12 403. In addition to his activities with TODHD, STAROPOLY, and ESTAR, FLEMING
13 offered the PAEGELS an opportunity to “invest” in the production of two movies that his
14 “personal company,” Seventh House Entertainment was trying to get off the ground. Not
15 surprisingly, the California Secretary of State has no registration for that company. EXHIBIT
16 44-A & B.

17 404. FLEMING freely used an e-mail address “SparkyProd,” in order to deceptively
18 promote himself as associated of Sparky Productions, which is a false representation. In fact,
19 Sparky Productions is a legitimate 501(c)(3) corporation, organized in Colorado with no
20 affiliation to FLEMING. EXHIBIT 44-C.

21 405. TODHD was nothing but an empty “shell” created to further the Criminal Scheme. It
22 never had any of the technological capabilities it was advertised to possess by CORNELL,
23 COX, VARONOS, FLEMING, BLEU, GRAMMER, ROBINSON, JUNCO, TORO,
24 MILLER, KING, VIEWPARTNER, TSOFTNET, STAROPOLY and NIVEN. EXHIBIT 44-
25 D thru F.

26 406. STAROPOLY was a Pyramid Scheme and not the multi-level marketing program as it
27 was so advertised and represented by GRAMMER, CORNELL, VARONOS, MILLER,
28 FLEMING, BLEU, BEATY, and FIN INST. EXHIBIT 44-F.

- 1 407. ESTAR was a "pay for service" scheme. EXHIBIT 44-G.
- 2 408. MC'S deceptively issued Payoneer cards that was a "sham" to make Associates
3 ascribe legitimacy to the Criminal Scheme. The cards were supposed to be a way for
4 STAROPOLY to pay Associates, however, there were no payments made. EXHIBIT 40.
- 5 409. CORNELL deceptively represented that GODSHOTS, SIE, LC ENTERPRISES,
6 Lydia Cornell Korniloff Venus Films and Productions ("VENUS"), Military Godshots,
7 Recovery Godshots and LYDIA CORNELL, INC were actually business enterprises. None of
8 these representations were true or represented legitimate business concerns. EXHIBIT 44-H
9 thru O, EXHIBIT 91.
- 10 410. CORNELL advertised GODSHOTS and Recovery Godshots on Facebook, Twitter,
11 LydiaCornell.com, U-stream, and LinkedIn as a charity in order to specifically and
12 fraudulently solicit donations from the public. EXHIBIT 44-P.
- 13 411. HAYELAND deceptively advertised GODSHOTS.TV on the internet, a non-entity
14 business, with the same address and post office box number as CORNELL'S
15 GODSHOTS.ORG. EXHIBIT 60.
- 16 412. HAYELAND registered GODSHOTS.TV as organized by SPORTS ICON IMAGES,
17 another false business.
- 18 413. HAYELAND and SIMMONS operated(s) SIE, GSAXE, AND AXE INC, none of
19 which were organized or licensed. EXHIBIT 44-Q thru W.
- 20 414. COX represented that LYRIX as a bona fide business being advertised on
21 lyrixenterprises.com and AV COMPUTER DOCTOR to promote and sell skills in internet
22 marketing and publishing. COX and KEITH advertise this non-entity business on the internet
23 and in the Lancaster, CA area where they reside. EXHIBIT 44-X thru AA, EXHIBIT 89.
- 24 415. COX advertised LYRIX on Facebook, LinkedIn, Twitter, Google and on AV
25 COMPUTER DOCTOR at 44519 10th St West Lancaster CA 93534, ph. 661-729-2823 owned
26 by Defendant KEITH.
- 27 416. KEHOE ran "house maker" and/or "companion" services in the state of Florida
28 without qualifying under the FCA, as required.

1 417. KING and MILLER advertised and operated HITMAN as a legitimate public relations
2 business from KING'S "chiropractic" office without a license from the City of San Marino and
3 contra the Chiropractic Rules of Ethics. Their contracts falsely stated that HITMAN/MILLER
4 was "Incorporated."

5 418. MILLER also deceptively promoted businesses known as Advanced Kinematic
6 Solutions (EXHIBIT 44-AB); LMMS; having a chiropractic office registered with the
7 California Chiropractic Board as located in a post office box; and falsely claimed to be a
8 member of an elite sports board, which he was not. In fact, *nothing* MILLER had ever said to
9 any plaintiff, agency, in his self-created advertisements, or to PLUIM'S court can be construed
10 as true.

11 419. KING and MILLER illegally used the office KING advertised as her chiropractic
12 office to promote and as the site of deceptive practices, forbidden by the California
13 Chiropractic Board. Chiropractors in California have strict ethics rules, which KING violated
14 in numerous ways.

15 420. KING intended to deceive the public by deceptively advertising fictitious names and
16 websites illegally. KING gave the City of San Marino false information about Advanced
17 Health Concepts and Body Slimming Experts. EXHIBIT 80. KING gave the City of San
18 Marino false EIN numbers.

19 421. KING'S website, dedicatedtohealth.com, promoted MILLER'S Criminal Schemes.
20 KING persisted in such deceptive practices, despite being disciplined by the California
21 Chiropractic Board and the City of San Marino.

22 422. KING advertised "massage therapy" on the internet at Advanced Health Concepts,
23 which required that she get a city permit and registration with the police chief of San Marino.
24 Because KING has no such permit, it must be concluded that she gives massage "therapy" in a
25 manner contrary to law. EXHIBIT 44-AC.

26 423. INS suborned KING'S illegal acts by hiring ALMEIDA, WILEMAN, KELETI and
27 YAO to defend her past practices instead of paying her claim for "business fraud." In so doing
28 they became intentional accomplices to KING'S deceptive business practices.

- 1 424. JUNCO admitted that GREEN was not a real company. EXHIBIT 14-I.
- 2 425. ROBINSON and WORMLEY were partners in MILNER. WORMLEY was fully
3 aware that ROBINSON was on suspension at the time he "represented" TBCS/PAEGELS
4 against JUNCO and TORO and took their \$5,000.00 retainer. ROBINSON was permanently
5 disbarred by the California State Bar and WORMLEY placed on probation.
- 6 426. ROBINSON and WORMLEY devised numerous other fraudulent businesses in the
7 furtherance of their Criminal Schemes.
- 8 427. VARONOS referred ROBINSON to the PAEGELS for legal work knowing that
9 ROBINSON was suspended from practicing law at the time. VARONOS conspired with
10 ROBINSON to protect JUNCO and TORO from suit.
- 11 428. Banking regulations prohibited MERITUS from operating without being properly
12 organized. All other FIN INST were implicated in MERITUS'S deceptive practices.
13 EXHIBIT 35.
- 14 429. COX falsely advertised a business "Event Staffing Professionals" on
15 lyrixenterprises.com making false claims that *inter alia* it held a copyright using AV Computer
16 Doctor programming. EXHIBIT 87-E.
- 17 430. According to the Copyright Catalogue, "Event Staffing Professionals" is not
18 copyrighted. EXHIBIT 88.
- 19 431. KEITH/AV COMPUTER DOCTOR ad included services of COX/LYRIX
20 ENTERPRISES making illegal SEO claims. EXHIBIT 89. Said SEO manipulation was one
21 of the illegal activities COX participated in for TODHD at the instruction of VARONOS.
- 22 432. For damages as a result of this Criminal Scheme, see ¶ 958.

23 **CRIMINAL SCHEME "B" PREDICATE ACTS**

- 24 433. WILEMAN, KELETI, YAO, and NEWELL represented facts and law to state and
25 federal courts.
- 26 434. WILEMAN, KELETI, YAO, NEWELL, PLUIM, ALMEIDA, and INS falsely
27 represented that WILEMAN was KING'S attorney of record.
- 28 435. INS ignored requested proof of WILEMAN'S hiring date.

436. ROBERTS claimed to represent both VARONOS and JUNCO, which were two members of the same Criminal Scheme. EXHIBIT 2.

437. ROBERTS falsely reported to PLUIM that neither TORO nor FLEMING had been "served."

438. For damages as a result of this Criminal Scheme, see ¶ 958.

EIGHTH CAUSE OF ACTION

FRAUD BY INTENTIONAL OR FRAUDULENT MISREPRESENTATION asserted by All Plaintiffs and DOE Plaintiffs 1-300 against Defendants CARMAX, GRAMMER, BLEU, CORNELL, KING, VARONOS, MULLIGAN, JACKSON, FLEMING, TORO, JUNCO, MILLER, ROBINSON, WORMLEY, HAYELAND, SIMMONS, FIN INST, NEWELL, COX, KEITH, KEHOE, NIVEN, TODHD, VIEWPARTNER, STAROPOLY, ESTAR, WILEMAN, ALMEIDA, KELETI, YAO, HAYELAND, CORNELL, JUNCO, TORO, VENUS, PLUIM, THOMAS, VARGAS, COLE, STELL, HAIGHT, CAMPION, SIMMONS, and DOE Defendants 1-300 Inclusive.

(The ACTS; CIVIL RICO; 18 U.S.C. § 1341; 18 U.S.C. § 1343; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations; 2010 Tennessee Code, Title 47, Uniform Deceptive Trade Practices Act No. §47-18-101 et seq.; Tennessee Consumer Protection Act of 1977 § 47-18-104.)

439. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-438 inclusive of this Complaint as if the same were hereat set forth in full.

440. Said Defendants participated in fraudulent acts for illegal purposes.

CRIMINAL SCHEME "A" PREDICATE ACTS

441. CARMAX stated that they gave a 10-day grace period on auto financing loans when they actually double charge interest during the so-called "grace" period.

442. GRAMMER, BLEU, CORNELL, KING, VARONOS, MULLIGAN, JACKSON,
FLEMING, TORO, JUNCO, MILLER, ROBINSON, WORMLEY, COX, KEITH, KEHOE,
HAYELAND, SIMMONS, FIN INST and NIVEN each misrepresented one or more of
TODHD, VIEWPARTNER, STAROPOLY, ESTAR, LYRIX ENTERPRISES, ADVANCED
HEALTH CONCEPTS, BODY SLIMMING EXPERTS, HITMAN PR, AV COMPUTER
DOCTOR, GSAXE, AXE LTD, SIE, LC, INC., GODSHOTS, GREEN, and VENUS as

1 legitimate businesses in order to deceive and defraud the Plaintiffs LEWIS, TBCS, PAEGELS
2 and public at large of their money and property.

3 443. FIN INST conspired and colluded with said GRAMMER, BLEU, CORNELL, KING,
4 VARONOS, FLEMING, TORO, JUNCO, MILLER, ROBINSON, WORMLEY,
5 HAYELAND, SIMMONS, NIVEN to defraud Plaintiffs and the public at large by receiving
6 money and property with misrepresentations and dishonesty.

7 444. GRAMMER, BLEU, CORNELL, VARONOS, WORMLEY, MILNER, FLEMING,
8 MILLER, KING, JUNCO, TORO, and ROBINSON knew that they were making
9 misrepresentations of fact at the time they entered into agreements or attempted to enter into
10 agreements either directly or indirectly with Plaintiffs. Said Defendants exercised undue
11 influence on one or more Plaintiffs, directly or indirectly.

12 445. CORNELL misrepresented facts to the rightful beneficiary of a home in order to gain
13 title on the property that CORNELL and HAYELAND mortgaged.

14 446. GRAMMER, CORNELL and BLEU defrauded the Screen Actor's Guild-American
15 Federation of Radio and Television Artists union ("SAG-AFTRA") by failing to report their
16 performance work in relation to MYEZTV, TODHD, STAROPOLY and/or ESTARTV.

17 447. MILLER'S initial agreement with TBCS/PAEGEL'S was between "HITMANPR/
18 A.S.MILLER" and "TNT FAMILY FINANCE"—both domain names owned by MILLER.
19 Essentially, MILLER attempted to intentionally charge TBCS/PAEGEL'S money on a
20 contract between MILLER and HIMSELF.

21 448. WELCH defrauded heirs by failing to litigate their motions and petitions or follow
22 well-established rules of law and discovery.

23 449. CAMPION suborned perjury and misrepresented facts to WELCH and HAIGHT.

24 450. CAMPION altered bank records of decedent and submitted them to the court. Neither
25 WELCH nor HAIGHT held CAMPION or STELL liable for committing this felony.

26 451. The time wasted owing to STELL and CAMPION crime cost heirs \$250,000.00.

27 452. CAMPION and STELL misrepresented to HAIGHT that there was a signed agreement
28 with the heirs. Despite knowing of their perjury, HAIGHT nevertheless accepted their

1 misrepresentations as fact and so based his ruling against heirs, excusing known criminal acts
2 by STELL and CAMPION.

3 453. HAIGHT defrauded heirs by refusing to follow federal and state law holding STELL
4 liable for numerous acts of perjury, the interstate transportation of stolen property, violations
5 of discovery, refusing to enforce reasonable subpoenas, and general breaches of fiduciary
6 duty and malfeasance.

7 454. HAIGHT defrauded heirs by approving CAMPION and STELLS' false, unsigned
8 accountings.

9 455. CAMPION defrauded heirs by concealing facts to which heirs were entitled to know.
10 Said concealment caused \$250,000.00 in loss and STELL and CAMPION refused to prove
11 the insurance proceeds.

12 456. HAIGHT, WELCH, SHERMAN, COLE, and PLUIM filed false 700's.

13 457. FANGARY misrepresented facts and law to SHERMAN.

14 458. SHERMAN suborned FANGARY'S mail tampering and mailbox tampering.

15 459. SHERMAN and FANGARY conspired to sanction NELLE by misrepresenting facts
16 and misapplying the law.

17 460. For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "B" PREDICATE ACTS

19 461. On January 18, 2013, in case no. GC047909, PLUIM, VARGAS and THOMAS
20 misrepresented that they needed to dismantle Plaintiff's "CONFORMED" copy of the original
21 complaint, thereby destroying evidence.

22 462. INS conspired and colluded with MILLER, KING, WILEMAN, NEWELL,
23 ALMEIDA, KELETI and YAO to defraud Plaintiffs LEWIS, TBCS, PAEGELS and NELLE
24 by defending and suborning KING'S business frauds.

25 463. PLUIM never read plaintiffs pleadings; instead he relied solely on KRATTI'S
26 judgment or asked WILEMAN how he should "rule" on matters.

27 464. INS misrepresented WILEMAN'S status.

28 465. Defendants misrepresented facts and law in all prior cases discussed *supra*.

- 1 466. WILEMAN misrepresented that his corrupted version of NELLE'S original complaint
2 in GC047909 to the federal court as "true and exact" on October 24, 2011.
- 3 467. INS intentionally concealed proof of the date when it hired WILEMAN.
- 4 468. PLUIM suborned the fraudulent misrepresentations asserted against him and others by
5 dismissing LEWIS'S Supplement, A RICO action, and the underlying case.
- 6 469. VARGAS defrauded Plaintiffs by misrepresenting the status of requests for default
7 against 14 Defendants in GC047909.
- 8 470. PLUIM, THOMAS, and VARGAS misrepresented that there was an arrest Warrant
9 against LEWIS.
- 10 471. For damages as a result of this Criminal Scheme, see ¶ 958.

11 **CRIMINAL SCHEME "C" PREDICATE ACTS**

- 12 472. CARMAX knew that LEWIS owned a clear title to the automobile that they reported
13 to the district attorney that was stolen by LEWIS.
- 14 473. PLUIM misrepresented the bases upon which he accused LEWIS of practicing law
15 without a license and denied LEWIS'S petitions for recusal. He violated LEWIS'S civil
16 rights by denying him an opportunity to refute WILEMAN'S misrepresentations.
- 17 474. PLUIM used undue influence and made false statements of fact about LEWIS and the
18 PAEGELS at every hearing. See generally, EXHIBIT 2.
- 19 475. At hearing on December 14, 2012, THOMAS and VARGAS misrepresented LEWIS
20 and NELLE'S absence from court. Instead, THOMAS and VARGAS allowed PLUIM to
21 unjustifiably prejudice the Plaintiffs.
- 22 476. CORNELL made numerous misrepresentations about LEWIS to courts.
- 23 477. MILLER misrepresented facts about the PAEGELS countless times.
- 24 478. WILEMAN knowingly submitted MILLER'S false Glendora police report to Los
25 Angeles Superior Court in case no. BC495150 against PAEGELS.
- 26 479. WILEMAN, YAO, KELETI, and INS misrepresented state and federal courts, Parties
27 and attorneys in GC047909 that they represented KING.
- 28 480. CORNELL misrepresented facts to NELLE in order to join the suit as a "mole."

481. CORNELL misrepresented facts to PLUIM, FIN WESTBROOK, KEHOE, COX, INST, INS, GRAMMER, WILEMAN, MILLER, WALSH, FORD, COLE, SCHWARTZ, Judge Joseph S. Bidderman, Sheriffs, and the F.B.I. about and against PAEGELS, LEWIS, LEWIS JIL LORRAINE, SCOTT and MINORS.

482. HADDOCK misrepresented his income to Judge Lisa S. Porter of Charlotte County Circuit Court, Florida by claiming MINOR 2 SSI disability payments was his personal income.

483. Said misrepresentations were made in order to deceive the court into giving him primary physical custody of MINORS 1 and 2. EXHIBIT 55. In fact, HADDOCK had no income whatsoever but stated that he paid taxes on the income.

484. BAC misrepresented his services to LORRAINE as "impartial" when he allowed HADDOCK'S attorney to conduct the mediation, draft the so-called "Record of Agreement," and intentionally allowed said attorney to misrepresent facts to LORRAINE as to what she was agreeing to. EXHIBIT 55.

485. BACS' misrepresentations constituted a breach of his fiduciary duty to LORRAINE
and the court.

486. Collectively, said Defendants colluded and conspired—on an on-going and continuous basis—defrauded the Plaintiffs and/or the public at large.

487. For damages as a result of this Criminal Scheme, see ¶ 958.

NINTH CAUSE OF ACTION

FRAUD BY NEGIGENT MISREPRESENTATION asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against ALL Defendants and DOE Defendants 1-300 Inclusive.

(The ACTS; CIVIL RICO; FTC Regulations; 2010 Tennessee Code, Title 47, Uniform Deceptive Trade Practices Act No. §47-18-101 et seq.; Tennessee Consumer Protection Act of 1977 § 47-18-104.)

488. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-487 inclusive of this Complaint as if the same were hereat set forth in full.

1 **CRIMINAL SCHEMES "A," "B," AND "C" PREDICATE ACTS**

2 489. All Defendants have—at minimum—made negligent misrepresentations that resulted
3 in fraud on all Plaintiffs, directly or indirectly.

4 490. As the PAG, LEWIS is authorized to reach back in time for ten years during discovery
5 and will be undoubtedly bringing significantly more charges against these and additional
6 Defendants for negligent misrepresentations resulting in fraud.

7 491. For damages as a result of this Criminal Scheme, see ¶ 958.

8 **TENTH CAUSE OF ACTION**

9 **FRAUD BY FRAUDULENT INDUCEMENT TO ENTER INTO CONTRACT** asserted by
10 Plaintiffs LEWIS, TBCS, PAEGELS, NELLE and DOE Plaintiffs 1-300 against Defendants
11 FIN INST, INS, CARMAX, GRAMMER, VARONOS, KING, MILLER, BLEU, FLEMING,
12 TORO, JUNCO, NIVEN, CORNELL, BEATY, ALMEIDA, WILEMAN, YAO, KELETI,
NEWELL, ROBINSON, WORMLEY, and DOE Defendants 1-300 Inclusive.

13 (The ACTS; CIVIL RICO; FTC Regulations; T.C.A. § 39-14-127; §47-18-104; Uniform
14 Deceptive Trade Practices Act No. §47-18-101 et seq.; Tennessee Consumer Protection Act of
15 1977 § 47-18-104; FL statute for caregiving §39.5085(2)(f))

16 492. By this reference, LEWIS herein incorporates each and every allegation of the
17 foregoing paragraphs 1-491 inclusive of this Complaint as if the same were hereat set forth in
full.

18 493. All said Defendants induced or attempted to induce said Plaintiffs to enter into
19 fraudulent contracts/agreements by misrepresentations of fact(s), directly or indirectly.

20 **CRIMINAL SCHEME "A" PREDICATE ACTS**

21 Defendants BLEU, JUNCO and TORO showed a promotional video for MYEZTV featuring
22 celebrity BLEU with the specific intent to fraudulently induce Plaintiff TBC/TBCS to enter
23 into contracts with GREEN, TORO, JUNCO, VARONOS, FLEMING, VIEWPARTNER,
24 TSOFTNET, TODHD, MILLER, NIVEN and KING. At the time of the viewing (sales pitch),
25 MYEZTV was already an abandoned company. EXHIBIT 27.

26 494. TBCS/PAEGELS were induced to “invest” \$77,546.62 in the so-called TODHD
27 NETWORK due to GRAMMER, BLEU, JACKSON, MULLIGAN, JUNCO and TORO’S
28 fraud.

1 495. VARONOS, JACKSON, MULLIGAN, and FLEMING knew that TODHD had no
2 technological advancement as they claimed; their misrepresentations induced Plaintiffs and
3 many others to “invest” in non-existent technology. Because TODHD was a sham, the intent
4 of its owners was to steal money and property.

5 496. FLEMING and VARONOS induced TBCS/PAEGELS stating that TODHD was
6 suitable for their particular uses—live streaming sporting events, subscription-based exercise
7 programs, cooking programs, health-based programs and the like. In truth, TODHD was
8 merely FLEMING’S artwork. Singlehandedly, FLEMING created material for the express
9 purpose of fraud.

10 497. FLEMING and VARONOS induced TBCS/PAEGELS into paying them directly by
11 trickery directly to their FARGO accounts sums totaling \$23,000.00 for a “channel” and logos
12 on the “TODHD network.”

13 498. GRAMMER, BLEU, and CORNELL induced hundreds, if not thousands, to invest in
14 the TODHD, STAROPOLY and ESTAR fraudulent schemes through their endorsements.

15 499. MILLER, KING, and NIVEN induced the contract with TBCS by making untrue
16 statements about their expertise and involvement with TODHD, STAROPOLY,
17 VIEWPARTNER, VARONOS, FLEMING, GRAMMER, and BLEU and each other.
18 Plaintiffs entered into agreements in reasonable reliance on Defendants’ promises and
19 representations; had they known the truth of these matters, they would never have entered into
20 any of the agreements.

21 500. Among MILLER’S false statements were “guaranteed” programming agreements with
22 third parties: World Series of Golf (WSOG), Marie Diamond, Christian Wilde, Julie Kicke,
23 and KING. MILLER was well aware that TODHD had no programming capabilities and that
24 his so-called programming agreements were just part of his Criminal Scheme.

25 501. MILLER, NIVEN and KING made said representations with the intent to induce
26 Plaintiff TBCS to enter into the Agreement. As a member of this Criminal Scheme, NIVEN
27 was paid \$10,000 for producing videos that she gave to MILLER, instead of PAEGELS.

28 502. MILLER’S inducements and misrepresentations about the third-party commitments

went to the heart of the contract. TBCS would not have otherwise entered into the
Agreement.

3 503. After discovering that MILLER/HITMAN/KING/NIVEN had defrauded them,
4 TBCS/PAEGELS refused to pay MILLER'S final invoice (\$4,500.00). MILLER retaliated
5 by filing a small claims action heard by PLUIM; worldwide defaming; false reporting,
6 extortions, and ruining the credit of the PAEGELS and their future earning abilities.
7 MILLER freely admitted to PLUIM that HITMAN "does not exist . . . it's just a website."

8 504. The true purpose for ALL of the aforementioned agreements made between
9 Defendants and Plaintiffs was to steal money and property on a tax free basis.

10 505. CARMAX failed to disclose it's practices of double-charging for interest; essentially
11 charging interest on interest so that in any month, the interest charged is as high as 40% of the
12 payment credited. EXHIBIT 95.

13 506. For damages as a result of this Criminal Scheme, see ¶ 958.

ELEVENTH CAUSE OF ACTION

INDUCEMENT TO COMMIT FRAUD asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and
DOE Plaintiffs 1-300 against Defendants CORNELL, VARONOS, KING, MILLER, BLEU,
GRAMMER, FLEMING, TORO, JUNCO, NIVEN, BEATY, FIN INST, INS, PLUIM,
THOMAS, VARGAS, INS, FIN INST, ROBERTS, ROBINSON, KING, JUNCO, MILLER,
KELETI, YAO, ALMEIDA, GODSHOTS, LC MEDIA ENTERPRISES, COX, ESTARTV,
JACKSON, MULLIGAN, STAROPOLY, TODHD, WILEMAN and DOE Defendants 1-300
Inclusive.

(The ACTS; CIVIL RICO; FTC Regulations; Uniform Deceptive Trade Practices Act No. §47-18-101 et seq.; Tennessee Consumer Protection Act of 1977 § 47-18-104)

22 507. By this reference, LEWIS herein incorporates each and every allegation of the
23 foregoing paragraphs 1-506 inclusive of this Complaint as if the same were hereat set forth in
full.

CRIMINAL SCHEME "A" PREDICATE ACTS

26 508. VARONOS, CORNELL, JUNCO, TORO, GRAMMER, BLEU, MILLER, KING,
27 ROBINSON, WORMLEY, NIVEN, FIN INST, and FLEMING induced fraudulent
agreements relating to their Criminal Schemes.

1 509. CORNELL, MILLER, VARONOS, FLEMING, GRAMMER, BEATY, FIN. INST,
2 BLEU, JUNCO, TORO, KING, and NIVEN attempted to "trick" Plaintiffs into committing
3 fraud in myriad ways.

4 510. Knowing that TODHD was a sham, MILLER induced TBCS/PAEGELS to defraud
5 advertisers by developing a brochure that falsely featured affiliations with Christian Wilde,
6 Xtreme Green, WSOG and Advanced Health Concepts (KING). EXHIBIT 47 is the
7 advertisement brochure created by MILLER that the PAEGELS rejected until and unless the
8 information about the featured affiliations was effectuated by written agreements. Shortly
9 thereafter, MILLER resigned from the TBCS/MILLER-HITMAN contract.

10 511. MILLER induced fraudulent representations by creating a false "marketing brochure."
11 EXHIBIT 47. This TRICK against the interests of his own "client" is a perfect example of
12 how MILLER and other members of the Criminal Scheme attempted to limit their liability—
13 by inducing their victims to commit some wrongful act. MILLER'S only defense was to
14 accuse his accusers of conduct they attributed to him.

15 512. NIVEN induced fraudulent videos at MILLER'S direction.

16 513. MILLER scripted an interview with a talk show host that included statements that
17 MILLER induced the PAEGEL'S to make by telling them that GRAMMER said them;
18 MILLER later accused Plaintiffs of "lying on the show."

19 514. CORNELL asked LEWIS to commit fraud in myriad ways. In addition to pressuring
20 LEWIS to sign up his friends on STAROPOLY, CORNELL tried unsuccessfully to get
21 LEWIS to pretend that he represented her as her attorney to: the I.R.S., Twitter, divorce
22 court, traffic court, an acting contractor, financial institutions, credit-reporting bureaus and the
23 public at large. In all instances, LEWIS refused to participate in CORNELL'S Criminal
24 Schemes. CORNELL tried to get LEWIS to sign an agreement that was intended to defraud
25 the I.R.S.

26 515. CORNELL created a form letter and sent it LEWIS to on May 29th 2012 @ 1:39:52:
27 P.M. The letter was a solicitation about GODSHOTS. CORNELL'S salutation included a
28 business called LC MEDIA ENTERPRISES. CORNELL wanted LEWIS to sign the letter

1 and send it to his contact list. At that time, LEWIS learned from the California Secretary of
2 State that none of CORNELL'S "businesses" were legitimate.

3 516. CORNELL tried to induce LEWIS to actively defraud the armed forces through her
4 GODSHOTS progeny "Military Godshots."

5 517. CORNELL also tried to induce LEWIS to administrate Military Godshots. EXHIBIT
6 48.

7 518. CORNELL also tried to get LEWIS to put her name on his real property deed.
8 CORNELL has a history of similar exploitation.

9 519. CORNELL tried to get LEWIS to write letters to legitimate owners of the
10 "GODSHOTS" name to tell them they were infringing on *HER* (nonexistent) trade name.
11 Again, LEWIS refused to participate in the Criminal Scheme.

12 520. For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "B" PREDICATE ACTS

14 521. All Defendants stole money and property, either directly or indirectly.

15 522. For damages as a result of this Criminal Scheme, see ¶ 958.

THIRTEENTH CAUSE OF ACTION

17 GRAND LARCENY THEFT of PERSONAL PROPERTY asserted by Plaintiffs LEWIS,
18 LEWIS III, LORRAINE, MINOR 2, PAEGELS, TBCS and DOE Plaintiffs 1-300 against
19 Defendants STELL, HADDOCK, GRAMMER, MILLER, CORNELL, KING, NIVEN,
20 FLEMING, ROBINSON, WORMLEY, JACKSON, JUNCO, TORO, MULLIGAN, and
21 VARONOS and DOE Defendants 1-300 Inclusive.

22 (The ACTS; CIVIL RICO; Tenn. Ann. Code § 40-35-111; The Identity Theft Enforcement and
23 Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations.)

24 523. By this reference, LEWIS herein incorporates each and every allegation of the
25 foregoing paragraphs 1-522 inclusive of this Complaint as if the same were hereat set forth in
26 full.

CRIMINAL SCHEMES "A" "B" AND "C" PREDICATE ACTS

27 524. STELL, HADDOCK, GRAMMER, MILLER, CORNELL, KING, NIVEN,
28 FLEMING, ROBINSON, WORMLEY, JACKSON, JUNCO, TORO, MULLIGAN, and
29 VARONOS stole money and/or property belonging to one or more of said Plaintiffs, directly

1 or indirectly.

2 525. MILLER sold PAEGELS stolen videotapes for sale on the Internet. EXHIBIT 58.

3 526. For damages as a result of this Criminal Scheme, see ¶ 958.

4 **FOURTEENTH CAUSE OF ACTION**

5 **GRAND THEFT OF MATERIAL** asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE
6 Plaintiffs 1-300 against Defendants MILLER, KING, NIVEN, VARONOS, TODHD,
7 VIEWPARTNER, FLEMING, CORNELL and DOE Defendants 1-300 Inclusive.

8 (The ACTS; CIVIL RICO; Tenn. Ann. Code § 40-35-111; National Stolen Property Act 18
U.S.C. § 2314; FTC Regulations.)

9 527. By this reference, LEWIS herein incorporates each and every allegation of the
10 foregoing paragraphs 1-526 inclusive of this Complaint as if the same were hereat set forth in
11 full.

12 **CRIMINAL SCHEME "A" PREDICATE ACTS**

13 528. LEWIS alleges and believes that Defendants NIVEN, KING and MILLER and their
14 agents digitized said material videotaped at the Variety EVENT on December 4, 2010 as well
15 as other material videotaped on or about September 1, 2010 through December 4, 2010 at
16 NIVEN'S studio, CarStar/Nuke the Fridge, Frank and Sons, Extreme Green, and Interviews
17 of Stephanie King, Randy Sotile, John Carter, and Walter Coulter and used it for their own
18 purpose(s), including, but not limited to, placing it on the internet to reach 5,000 sites
19 including to "pktube.onePakistan.com, Prismotube, tube.7s-b.com, mahaythi.com,
20 bluesplayer.co.uk., ISPs, Youtube and Facebook. All of these HD videos were stolen from
21 the PAEGELS/TBCS by the combined efforts of MILLER, KING, NIVEN, VARONOS,
22 FLEMING, VIEWPARTNER and CORNELL.

23 529. For damages as a result of this Criminal Scheme, see ¶ 958.

24 **FIFTEENTH CAUSE OF ACTION**

25 **UNFAIR METHODS OF COMPETITION AND UNFAIR OR DECEPTIVE ACTS OR**
26 **PRACTICES** asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300
27 against Defendants ALMEIDA, BEATY, BLEU, CARMAX, CORNELL, COX, JUNCO,
28 TORO, FLEMING, GRAMMER, HAYELAND, JACKSON, KEHOE, MILLER,
MULLIGAN, NIVEN, PLUIM, ROBERTS, ROBINSON, SIMMONS, THOMAS, VARONOS,

1 VARGAS, WILEMAN, WORMLEY, YAO, KING, KEHOE, KEITH, PLUIM, KELETI,
2 NEWELL, INS, FIN INST and DOE Defendants 1-300 Inclusive.

2 (CIVIL RICO; FTC Regulations; The ACTS; T.C.A. §§ 56-8-103 through 108; T.C.A. § 47-50-
3 109; Uniform Deceptive Trade Practices Act § 47-18-104 & 108)

4 530. By this reference, LEWIS herein incorporates each and every allegation of the
5 foregoing paragraphs 1-529 inclusive of this Complaint as if the same were hereat set forth in
6 full.

7 **CRIMINAL SCHEME "A" PREDICATE ACTS**

8 531. On the strength of the endorsements made directly or indirectly by GRAMMER,
9 CORNELL, and BLEU, TBCS and the PAEGELS/TBCS shifted from their original business
10 plan to having their TODHD channel become the means by which they would present their
11 programs to the public at large with their third-party affiliates.

12 532. Said Defendants knew or should have known that others would rely on their averments
13 and change their business positions based on those averments.

14 533. When TODHD turned out to be a fraud and owing to the abuse all had suffered as a
15 result of abuse by KING and MILLER said third-party relationships of TBCS were destroyed.

16 534. In fact, it was the intent of VARONOS, FLEMING, MILLER, KING, JUNCO, and
17 TORO to destroy TBCS'S third-party agreements as part of their Criminal Scheme.

18 535. Material belonging solely to TBCS/PAEGEL was distributed by MILLER and his
19 con-conspirators on the internet without their permission.

20 536. VARONOS, KING, MILLER, FLEMING, TORO, JUNCO, GRAMMER, BLEU,
21 CORNELL concealed that TODHD was a Pyramid scheme.

22 537. CARMAX misrepresented its finance charge calculations.

23 **CRIMINAL SCHEME "C" PREDICATE ACTS**

24 538. LEWIS III and LORRAINE each lost their employment owing to retaliation against
25 LEWIS by all said members of the Criminal Scheme, directly or indirectly.

26 539. NELLE'S professional career has been irreparably damaged owing to retaliation by all
27 said members of the Criminal Scheme, directly or indirectly.

28 540. The MINOR'S have been irreparably harmed owing to retaliation against LEWIS by

1 all said members of the Criminal Scheme, directly or indirectly.

2 541. LEWIS'S reputation has been irreparably harmed owing to retaliation of members of
3 the Criminal Scheme, directly or indirectly.

4 542. For damages as a result of this Criminal Scheme, see ¶ 958.

5 SIXTEENTH CAUSE OF ACTION

6 UNAUTHORIZED PRACTICE OF LAW asserted by Plaintiffs LEWIS, TBCS, PAEGELS,
7 and DOE Plaintiffs 1-300 against Defendants ROBINSON, WORMLEY, VARGAS, THOMAS,
8 WALSH, PLUIM, WILEMAN, KELETI, YAO, NEWELL, ROBERTS, FANGARY,
9 CAMPION, HAIGHT, WELCH, SHERMAN, COLE, and DOE Defendants 1-300 Inclusive.

10 (The ACTS; CIVIL RICO; Unauthorized Practice and Improper Conduct T.C.A. § 23-3-103;
11 Canons of Judicial Conduct; Rule 5.5, Chapter 5 Model Rules of Professional Conduct; FTC
12 Regulations.)

13 543. By this reference, LEWIS herein incorporates each and every allegation of the
14 foregoing paragraphs 1-542 inclusive of this Complaint as if the same were hereat set forth in
15 full.

16 CRIMINAL SCHEME "A" PREDICATE ACTS

17 544. Said Defendants committed illegal acts during the course and scope of their duties as
18 attorneys, judge, clerks, and defendants being represented by counsel as well as defendants
19 representing themselves *in pro per*, such acts included, but are not limited to: mail tampering,
20 mailbox tampering, suborning perjury, knowingly submitting falsified documents to a court,
21 bias, failing to adjudicate, bribery, perjury, obstruction of justice, conspiracy, collusion, denial
22 of due process, life endangerment, issuing an unlawful warrant for arrest, corruption,
23 submitting false documents to a federal court, soliciting perjured testimony, defamation,
24 computer hacking, internet fraud, internet hacking, bank fraud, identity theft, tax fraud, tax
evasion, ex parte communications and conspiracies, collusion to defraud, misrepresentations
of law, misrepresentations of facts, creating false identities and identity theft.

25 545. ROBINSON and WORMLEY illegally practiced law at the time of taking
26 PAEGELS/TBCS as a "client/victim." In fact, ROBINSON was disbarred for committing
27 numerous instances of fraud in the same Criminal Scheme that he defrauded
28

1 TBCS/PAEGELS.

2 546. For damages as a result of this Criminal Scheme, see ¶ 958.

3 **CRIMINAL SCHEME "B" PREDICATE ACTS**

4 547. INS intentionally concealed proof of the date when it hired WILEMAN. Instead, INS
5 informed NELLE that WILEMAN was the attorney of record; as that determination is a legal
6 conclusion, INS was not authorized to make it.

7 548. WALSH gave legal advice to CORNELL without a California license.

8 549. YAO refused to report for a subpoenaed deposition or submit her subpoenaed
9 "working copy of the complaint" to Plaintiffs. Because she refused to provide same it must be
10 presumed that she was at least aware that she was submitting pleadings based upon a false
11 "complaint."

12 550. COLE violated LEWIS'S due process rights by precluding LEWIS from access to the
13 file for case No. SS022572, which COLE failed to return to the Clerk of the Santa Monica
14 Courthouse.

15 551. For damages as a result of this Criminal Scheme, see ¶ 958.

16 **CRIMINAL SCHEME "C" PREDICATE ACTS**

17 552. Acting under color of the judicial system, PLUIM, EDMON, KRATTI, WESLEY,
18 WILEMAN, KELETI, THOMAS, and VARGAS adopted and issued a warrant for "LEWIS'S
19 arrest without bail" based upon their "trumped up" felony record because LEWIS was
20 pursuing a RICO case against them in California.

21 553. For damages as a result of this Criminal Scheme, see ¶ 958.

22 **SEVENTEENTH CAUSE OF ACTION**

23 **BREACH OF CONTRACT** asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE
24 Plaintiffs 1-300 against Defendants ALMEIDA, WILEMAN, KELETI, YAO, NEWELL,
25 CORNELL, MILLER, KING, JUNCO, TORO, NIVEN, VARONOS, FLEMING, JACKSON,
MULLIGAN, ROBINSON, GRAMMER, BLEU, WORMLEY, BEATY, FIN INST, INS and
26 DOE Defendants 1-300 Inclusive.

27 (The ACTS; CIVIL RICO; Tenn. Code Ann. § 47-50-109; TN common law Restatement
(Second) of Contracts; U.C.C; U.S. common law; TN common law; CA common law; The
28 Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations.)

1 554. By this reference LEWIS herein incorporates each and every allegation of the
2 foregoing paragraphs 1-553 inclusive of this Complaint as if the same were hereat set forth in
3 full.

4 **CRIMINAL SCHEME "A" PREDICATE ACTS**

5 555. GRAMMER, BLEU and CORNELL used their celebrity as a "shill" for the Criminal
6 Scheme to defraud PAEGELS and numerous other members of the public.

7 556. The video by BLEU made false claims. BLEU knew at the time that he was making
8 false promises about the capabilities of TODHD/MYEZTV. EXHIBIT 92-J.

9 557. GRAMMER knowingly encouraged reliance on his celebrity for the purpose of
10 committing fraud. See generally, EXHIBIT 92.

11 558. GRAMMER, CORNELL, BLEU, MILLER, KING, FLEMING, VARONOS, made
12 agreements or knew their status was being used to make agreements that were all based upon
13 fraud. EXHIBIT 92.

14 559. MILLER, VARONOS, KING, FLEMING, ROBINSON, WORMLEY, JUNCO and
15 TORO entered into or proposed one or more fraudulent agreements with TBCS/PAEGELS
16 based upon their general and individual Criminal Schemes. EXHIBITS 23, 25, 26, 28, 29, 92-
17 U.

18 560. Said Defendants entered into one or more contracts—directly or indirectly—with one
19 or more Plaintiffs and countless members of the public at large that said Defendants breached
20 by bad faith, fraud, misrepresentations of fact and in furtherance of the Criminal Schemes.

21 561. Said Defendants never intended to perform according to the terms of any of the
22 agreements made.

23 562. Said contracts were made by said Defendants for the sole purpose of deceiving
24 Plaintiffs and the public into believing that said Defendants were capable of providing services
25 and/or products that they lacked any capacity or willingness to provide, at the time of the
26 agreement, as part of the Criminal Scheme.

27 563. FIN INST breached their express and/or implied duty to ensure Plaintiffs that the
28 charges being made on their credit/debit cards and at their banks was for a legal and legitimate

1 purpose.

2 564. FIN INST violated banking regulations by knowingly charging customer accounts in
3 furtherance of the Criminal Scheme. EXHIBITS 18 and 39.

4 565. CORNELL borrowed money from LEWIS with the intent of never paying him back.

5 566. For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "B" PREDICATE ACTS

7 567. Acting in bad faith, INS breached their implied agreements to by failing to properly
8 process KING'S claims and instead perpetrating fraud on the courts and plaintiffs.

9 568. FIN INST breached their duty to self-report that they had been sued under RICO.

10 569. INS breached their duty to self-report that they had been sued under RICO.

11 570. INS breached their duty to the Plaintiffs and the public trust by engaging ALMEIDA,
12 WILEMAN, NEWELL, KELETI and YAO to fraudulently represent KING.

13 571. CORNELL breached her agreement with NELLE for legal services.

14 572. For damages as a result of this Criminal Scheme, see ¶ 958.

EIGHTEENTH CAUSE OF ACTION

16 **BREACH OF COVENANT OF GOOD FAITH AND FAIR DEALING asserted by Plaintiffs**
17 **LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against Defendants ALMEIDA,**
18 **WILEMAN, KELETI, YAO, NEWELL, CORNELL, MILLER, KING, JUNCO, TORO,**
19 **NIVEN, VARONOS, FLEMING, JACKSON, MULLIGAN, KING, BLEU, ROBINSON,**
GRAMMER, WORMLEY, BEATY, FIN INST, INS and DOE Defendants 1-300 Inclusive.

20 (The ACTS; CIVIL RICO; Tenn. Code Ann. § 47-50-109; TN common law; Restatement
(Second) of Contracts; U.C.C.; and U.S. common law)

21 573. By this reference, LEWIS herein incorporates each and every allegation of the
22 foregoing paragraphs 1-572 inclusive of this Complaint as if the same were hereat set forth in
23 full.

CRIMINAL SCHEME "A" PREDICATE ACTS

25 574. JUNCO, TORO, MILLER, VARONOS, FLEMING, ROBINSON, WORMLEY,
26 BEATY, FIN INST, CORNELL, GRAMMER, JACKSON, MULLIGAN, KING, BLEU and
27 NIVEN breached the covenant of good faith and fair dealing by soliciting—directly or
28 indirectly—countless fraudulent agreements with Plaintiffs and other members of the public.

1 575. The foregoing paragraphs include the rather numerous contracts entered into by these
2 parties; breach occurred as a result of said Defendants fraudulent representations made at
3 formation. No defendant ever intended to perform as agreed.

4 576. Said Plaintiffs fully performed as agreed until breach by said Defendants became self-
5 evident.

6 577. FIN INST breached the covenant by failing to properly supervise or investigate the
7 fraudulent use of bank accounts and credit/debit card processing by Defendants.

8 578. FIN INST knew or should have known they were furthering the intentions of the
9 Criminal Scheme by enabling Defendants to process credit cards and monies.

10 579. Plaintiffs and the public at large had a legitimate expectation that FIN INST will
11 protect their private information from such fraudulent uses.

12 580. Once the FIN INST became aware that their services had been used for illegal
13 purposes they had a further duty to rectify their mistake; instead FIN INST defended
14 themselves in order to continue the Criminal Schemes.

15 581. CORNELL recruited LEWIS directly as an associate of STAROPOLY; she
16 represented STAROPOLY to be a legitimate multilevel marketing firm.

17 582. GRAMMER promoted and continued to promote STAROPOLY, TODHD, and/or
18 ESTAR despite his personal knowledge that none of them were legitimate.

19 583. FIN INST, BEATY, FLEMING, and VARONOS concealed all but the most basic
20 terms of the contract that associates entered at the time of enrollment. The actual agreement
21 contained oppressive and clauses that no one would knowingly agree to. EXHIBIT 35.

22 584. Neither ROBINSON nor WORMLEY had any intention of suing JUNCO and TORO
23 on behalf of TBCS/PAEGELS for their theft. ROBINSON took \$5,000.00 in furtherance of
24 the Criminal Scheme on the pretext of filing suit to recover their money.

25 585. JUNCO and TORO knew at the outset that GREEN was a fake business.

26 586. CORNELL knew at the time she filed suit as a plaintiff that her true purpose was to
27 aid the defendants in furtherance of their Criminal Schemes.

28 587. For damages as a result of this Criminal Scheme, see ¶ 958.

1 **CRIMINAL SCHEME "B" PREDICATE ACTS**

2 588. CORNELL intended to breach her agreements for legal work with NELLE.

3 589. CORNELL intended to take money from LEWIS under false pretenses. Her attitude
4 towards LEWIS became abusive, defamatory, and "malignant" immediately after he declined
5 to loan her more money.

6 590. For damages as a result of this Criminal Scheme, see ¶ 958.

7 **NINETEENTH CAUSE OF ACTION**

8 **TORTIOUS INTERFERENCE WITH CONTRACT AND INTENTIONAL INTERFERENCE**
9 **WITH BUSINESS RELATIONSHIPS** asserted by All Plaintiffs and DOE Plaintiffs 1-300
10 against Defendants BEATY, MILLER, KING, VARONOS, FLEMING, HADDOCK, NIVEN,
11 CORNELL, JUNCO, TORO, ROBERTS, WILEMAN, KELETI, YAO, NEWELL,
12 GRAMMER, STERNBERG, KEHOE, FIN INST, INS, and DOE Defendants 1-300.

13 (The ACTS; CIVIL RICO; T.C.A. § 47-50-109; *Restatement (Second) of Torts*, comment c, §
14 766B; "Restatement (Second) of Contracts; U.S. Common Law; TN common law; CA common
15 law; FTC Regulations.)

16 591. By this reference, LEWIS herein incorporates each and every allegation of the
17 foregoing paragraphs 1-590 inclusive of this Complaint as if the same were hereat set forth in
18 full.

19 **CRIMINAL SCHEME "A" PREDICATE ACTS**

20 592. Said Defendants tortuously and intentionally interfered with said Plaintiffs contractual
21 relationships, either directly or indirectly.

22 593. MILLER, KING, VARONOS, and FLEMING personally contacted PAEGELS/TBCS
23 during which they knowingly made false promises that ruined legitimate business relationships
24 of PAEGELS and TBCS solely by said Defendants interferences.

25 594. For damages as a result of this Criminal Scheme, see ¶ 958.

26 **CRIMINAL SCHEME "B" PREDICATE ACTS**

27 595. MILLER tortuously interfered with NELLE'S law business by conducting a wide-
28 spread retaliation campaign against her on the internet. Examples of these are shown in
EXHIBIT 38.

596. MILLER intentionally interfered with NELLE'S business relationships by making

1 untrue statements about her legal acumen on the internet, discouraging prospective business.
2
3 597. MILLER attempted to interfere with contracts and prospective business relationships
4 by filing false complaints against NELLE with the California State Bar, The Walnut Sheriff's
Dept., and The Glendora Police Dept.

5 598. MILLER chased NELLE'S process server up a public street threatening him with a
6 firearm.

7 599. For damages as a result of this Criminal Scheme, see ¶ 958.

8 **CRIMINAL SCHEME "C" PREDICATE ACTS**

9 600. LEWIS III was forced to change jobs and relocate his residence as a direct result of his
10 employment being negatively affected by the acts of said Defendants as part of the Criminal
11 Schemes.

12 601. LEWIS, LORRAINE and MINORS were separated from each other as a result of
13 HADDOCK, KEHOE, CORNELL, and MILLER'S fraudulent conspiratorial participation in
14 the Criminal Schemes.

15 602. Said Defendants conspired to endanger MINORS, which disrupted the prior business
16 relationship between LORRAINE and her ex-husband, HADDOCK.

17 603. CORNELL tried numerous times and in various ways to break the relationship
18 between LEWIS and PAEGEL in furtherance of Criminal Schemes A, B, and C.

19 604. For damages as a result of this Criminal Scheme, see ¶ 958.

20 **TWENTIETH CAUSE OF ACTION**

21 **FRAUD AND ABUSE INCLUDING ELDERLY ABUSE VIA THE INTERNET; COMPUTER**
22 **FRAUD AND ABUSE; ABUSE OF THE DISABLED** asserted by all Plaintiffs and DOE
23 Plaintiffs 1-300 against all Defendants and DOE Defendants 1-300.

24 (The ACTS; CIVIL RICO; T.C.A. § 39-14-903 et seq; T.C.A. § 47-18-104, 106, 107, 108, 109, 114;
25 T.C.A. § 47-18-5202; Tennessee Consumer Protection Act of 1977; U.S. Common Law; Money
laundering, 18 U.S.C. § 1956; The Identity Theft Enforcement and Restitution Act of 2008, 18
U.S.C. § 1030; FTC Regulations; 18 U.S.C. § 1028(a)(7); the National Stolen Property Act
(NSPA); the Wire Fraud Act; the Economic Espionage Act (EEA); Tennessee Adult Protection
Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. § 46-455; Fl. Stat. §
825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6;
T.C.A. 71-6-120 et seq. Tenn. Adult Protection Act.)

1 605. By this reference, LEWIS herein incorporates each and every allegation of the
2 foregoing paragraphs 1-604 inclusive of this Complaint as if the same were hereat set forth in
3 full.

4 606. All Defendants participated in one or more Criminal Schemes to promote and
5 effectuate, in part, their wrongful activities via the internet.

6 **CRIMINAL SCHEME "A" PREDICATE ACTS**

7 607. FIN INST enabled the fraudulent taking of money from Plaintiffs by providing illegal
8 financial wire transfers, money laundering transactions, and credit card processing services.

9 608. COX, KEITH, VARONOS, FLEMING, JACKSON, MULLIGAN, JUNCO, TORO,
10 MILLER, KING, NIVEN, CORNELL, HAYELAND, SIMMONS, GRAMMER, BLEU,
11 ROBINSON, WORMLEY, FIN INST. and INS defrauded Plaintiffs and the public at large via
12 the internet.

13 609. LEWIS was defrauded by CORNELL via the internet, where she initiated contact with
14 him.

15 610. WESTBROOK used the internet and the phone to stalk and abuse SCOTT, LEWIS'S
16 mother, and LEWIS.

17 611. GRAMMER used his "kelseylive.com" web site to ascribe credibility to knowingly
18 fake Criminal Schemes: TODHD, STAROPOLY, and ESTAR.

19 612. All Plaintiffs were abused and defrauded via the internet by one or more Defendants
20 MILLER, KING, GRAMMER, VARONOS, FLEMING, JUNCO, TORO, ROBINSON,
21 CORNELL, COX, WESTBROOK, KEHOE, WILEMAN, JACKSON, MULLIGAN, PLUIM,
22 THOMAS, VARGAS, SCHWARTZ, B.H.P.D., FANGARY, and SHERMAN.

23 613. The public at large was defrauded by HAYELAND, SIMMONS, KEITH, KEHOE,
24 MILLER, KING, VARONOS, FLEMING, JACKSON, MULLIGAN, HAIGHT, COLE,
25 PLUIM, SHERMAN, FIN INST, WELCH and CORNELL.

26 614. For damages as a result of this Criminal Scheme, see ¶ 958.

27 **CRIMINAL SCHEME "B" PREDICATE ACTS**

28 615. PLUIM, WILEMAN, THOMAS, MILLER, KING, YAO, KELETI, FANGARY,

1 CAMPION, STELL and VARGAS posted their illegal activities and pleadings on the internet.
2
3 616. INS used the internet to receive complaints with no intent to act on those complaints.
4
5 617. MILLER, KING, CORNELL, HAYELAND, SIMMONS, COX, KEITH, KEHOE,
and WILEMAN used the internet to defraud Plaintiffs and/or the public at large.
6
7 618. For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "C" PREDICATE ACTS

8
9 619. PLUIM issued and THOMAS, and VARGAS knowingly posted an illegal Warrant
against LEWIS based *solely* on a false and fraudulent "internet profile" of LEWIS that was
created by WILEMAN. They did so in furtherance of the Criminal Scheme to coerce LEWIS
into foregoing his RICO action against them.
10
11 620. Said Warrant endangered LEWIS'S life, health, and welfare and violated his civil
rights.
12
13 621. Said false and fraudulent profile of LEWIS was distributed on the internet by
CORNELL, WILEMAN, MILLER, COX and KEHOE.
14
15 622. WILEMAN harassed LEWIS and NELLE through e-mail and by fax after he was told
to correspond only through the mail.
16
17 623. MILLER and KING used the internet to: harass, stalk, hack, defraud, falsely advertise,
send hate mail, extort, blackmail, threaten, infringe, defame, and endanger Plaintiffs.
18
19 624. CORNELL, COX, MILLER, HADDOCK and KEHOE colluded and conspired to
damage and cause bodily harm to Plaintiffs LEWIS, LEWIS III, NELLE, LORRAINE and
MINORS via the internet.
20
21 625. CORNELL used myriad internet sites including, but not limited to, lydialive.com,
Linked-in, Facebook, and Wikipedia to defraud, defame and harass LEWIS and the public at
large.
22
23 626. Said Defendants conspired to harass one or more Plaintiffs on the internet.
24
25 627. WALSH and FORD threatened LEWIS via the internet.
26
27 628. SCHWARTZ and B.H.P.D. defrauded LEWIS by issuing a false Warrant.
28 629. For damages as a result of this Criminal Scheme, see ¶ 958.

TWENTY-FIRST CAUSE OF ACTION

INTERNET PIRACY asserted by Plaintiffs LEWIS, TBCS, PAEGELS and DOE Plaintiffs 1-300 against CORNELL, COX, KEHOE, MILLER, KING, VARONOS, FLEMING, JACKSON, MULLIGAN, NIVEN and DOE Defendants 1-300.

(The ACTS; CIVIL RICO; T.C.A. § 39-14-903 et seq.; T.C.A. § 47-25-1702; T.C.A. § 47-2-721; Consumer Protection Act of 1977; T.C.A. § 47-18-103; TN Common Law; U.S. Common Law; Gangs Act; ACTA; Money laundering, 18 U.S.C. § 1956; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations)

630. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-629 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS

631 MILLER and KING sold pirated material on the internet. EXHIBIT 49.

632. VARONOS, FLEMING, JACKSON, and MULLIGAN promoted internet activities in
order to pirate the property of others for profit.

633 CORNELL pirated LEWIS'S material and used it to promote her illegal internet sales.

⁶³⁴ For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "C" PREDICATE ACTS

635. WILEMAN, CORNELL, KELETI, and VARONOS pirated material that they used to defame LEWIS

⁶³⁶ For damages as a result of this Criminal Scheme, see ¶ 958.

TWENTY-SECOND CAUSE OF ACTION

NEGLIGENCE/ GROSS NEGLIGENCE asserted by All Plaintiffs and DOE Plaintiffs 1-300 against All Defendants and DOE Defendants 1-300.

(CIVIL RICO; Restatement (Third) of Torts—Negligence, Agency, Restitution, Non-Profit Organizations; 12 U.S.C. § 2605(e)(2)(A) and (e)(3); TN Uniform Contribution Among Tort FeasorsAct §§ 29-11-101 *et seq.*; Moneylaundering; T.C.A. § 39-14-903 *et seq.* Tennessee Common Law; TN Gangs Act; U.S. Common Law)

637. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-636 inclusive of this Complaint as if the same were hereat set forth in full.

1 **CRIMINAL SCHEME "A"**

2 638. All Plaintiffs were harmed by the negligent acts or omissions to act by all Defendants
3 as shown by EXHIBITS 1-93 and the foregoing paragraphs.

4 639. The activities of MILLER, KING, VARONOS, FLEMING, NIVEN, GRAMMER,
5 BLEU, FIN INST, BEATY, CORNELL, COX, JUNCO, TORO, HAYELAND, JACKSON,
6 MULLIGAN, ROBINSON, SIMMONS, and WORMLEY completely disregarded the rights of
7 any Plaintiff.

8 640. INS exhibited a complete disregard for the consequences of hiring WILEMAN, YAO,
9 NEWELL and KELETI who altered documents before submitting them to the court,
10 misrepresented facts and laws, twisted the law at will in their pleadings and at hearings, and
11 represented other Defendants indiscriminately.

12 641. FIN INST exhibited a complete disregard for whether STAROPOLY,
13 VIEWPARTNER, TSOFTNET, ESTAR.TV, TODHD, MERITUS, VENUS, AXE, LC
14 ENTERPRISES, GSAXE, GRAMMER'S COMPANIES, GODSHOTS, AV COMPUTER
15 DOCTOR, and LYRIX were legitimate business concerns.

16 642. For damages as a result of this Criminal Scheme, see ¶ 958.

17 **CRIMINAL SCHEME "B"**

18 643. By their actions, ALMEIDA, COLE, CORNELL, INS, FIN INST, HADDOCK,
19 KELETI, KING, MILLER, NEWELL, PLUIM, ROBERTS, THOMAS, VARGAS,
20 WILEMAN, and YAO conspired with each other to demonstrate a complete disregard for the
21 rights of the Plaintiffs.

22 644. Acting as judicial officers, PLUIM, COLE, HAIGHT, WELCH and SHERMAN
23 demonstrated a complete disregard for Plaintiffs' procedural and substantive rights to due
24 process.

25 645. THOMAS and VARGAS knowingly and actively disregarded due process.

26 646. For damages as a result of this Criminal Scheme, see ¶ 958.

27 **CRIMINAL SCHEME "C"**

28 647. ALMEIDA, KEITH, COLE, CORNELL, COX, INS, FORD, HADDOCK, KEHOE,

1 KELETI, FIN INST, PLUIM, ROBERTS, THOMAS, VARGAS, WALSH, WILEMAN,
2 VARONOS, MILLER, KELETI conspired against LEWIS so as to completely disregard the
3 rights of LORRAINE, LEWIS III and MINORS, in order to thwart his CIVIL RICO action
4 against PLUIM, CORNELL, WILEMAN, MILLER, KING, GRAMMER, and THOMAS.

5 648. THOMAS and VARGAS completely disregarded LEWIS'S rights to due process and
6 conspired to threaten him by getting Sheriffs to stand behind LEWIS and NELLE at a hearing.

7 649. THOMAS and VARGAS falsified information on the Case Summary.

8 650. For damages as a result of this Criminal Scheme, see ¶ 958.

TWENTY-THIRD CAUSE OF ACTION

9 10 **GRAND THEFT BY EMBEZZLEMENT asserted by Plaintiffs LEWIS, TBCS, PAEGELS,**
11 **and DOE Plaintiffs 1-300 against Defendants VARONOS, MULLIGAN, JACKSON,**
12 **GRAMMER, BLEU, KING, MILLER, FLEMING, TORO, JUNCO, NIVEN, CORNELL,**
13 **BEATY, PLUIM, THOMAS, VARGAS, FIN. INST., ROBINSON, WORMLEY, STELL and**
DOE Defendants 1-300 Inclusive)

14 (The ACTS; CIVIL RICO; T.C.A. § 39-14-101; T.C.A. § 39-14-103; T.C.A. § 39-14-112; T.C.A.
15 § 39-14-114 T.C.A. § 39-14-118; T.C.A. § 39-14-127; T.C.A. § 39-14-136; T.C.A. § 39-14-903;
16 The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030)

17 651. By this reference, LEWIS herein incorporates each and every allegation of the
18 foregoing paragraphs 1-650 inclusive of this Complaint as if the same were hereat set forth in
full.

CRIMINAL SCHEME "A" PREDICATE ACTS

20 652. The foregoing described fake "businesses" embezzled money and property from
21 Plaintiffs and the public at large.

22 653. STELL used his fiduciary position to embezzle from heirs.

23 654. FIN INST caused embezzlement of LEWIS, PAEGELS, TBCS by failing to comply
24 with state and federal banking regulations.

25 655. INS embezzled money and property from TBCS and PAEGELS, directly or indirectly.

26 656. GRAMMER, VARONOS, TORO, JUNCO, NIVEN, SIMMONS, HAYELAND,
27 CORNELL, BLEU, MILLER, KING, ROBINSON, WORMLEY, JACKSON, MULLIGAN
28 and FLEMING intended to use their self-created fake "businesses" to embezzle from said

1 Plaintiffs and the public at large.

2 657. For damages as a result of this Criminal Scheme, see ¶ 958.

3 **CRIMINAL SCHEME "B" PREDICATE ACTS**

4 658. WILEMAN, YAO, KELETI, MILLER, GRAMMER, PLUIM, KING, THOMAS and
5 VARGAS used the judicial system to embezzle from the PAEGELS, TBCS, and LEWIS, by
6 falsifying court records, requiring unnecessary pleadings to be filed at Plaintiffs expense,
7 failing to adjudicate, submitting faked documents, perjury, violating the fiduciary duty of the
8 judicial system to follow the rules of law, and by use of threats and intimidation during
9 hearings in order to further the interests of Defendants and the Criminal Scheme.

10 659. CORNELL and HAYELAND embezzled property and money from the rightful
11 beneficiary of an estate.

12 660. For damages as a result of this Criminal Scheme, see ¶ 958.

13 **TWENTY-FOURTH CAUSE OF ACTION**

14 **FALSE LIGHT INVASION OF PRIVACY, PHISHING AND SPOOFING asserted by All**
15 **Plaintiffs and DOE Plaintiffs 1-300 against CORNELL, COX, KEHOE, MILLER,**
16 **HADDOCK, SCHWARTZ, B.H.P.D., WILEMAN, KING, THOMAS, PLUIM, VARGAS and**
DOE Defendants 1-300 Inclusive.

17 (U.S. CONST. art 14; The ACTS; Section 652E of the RESTATEMENT (SECOND) OF
18 TORTS (1977) and Comments to Sections 652A and 652E-I; T.C.A. § 39-13-601; Anti-Phishing
19 Act of 2006; U.S. Common Law; Fed. Privacy Act of 1974; 18 U.S.C. § 2511; The Identity Theft
20 Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations; Tennessee Adult
Protection Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; Fl.
Stat. § 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6;
21 T.C.A.71-6-120 et seq. Tenn. Adult Protection Act)

22 661. By this reference, LEWIS herein incorporates each and every allegation of the
23 foregoing paragraphs 1-662 inclusive of this Complaint as if the same were hereat set forth in
24 full.

25 **CRIMINAL SCHEME "A" PREDICATE ACTS**

26 662. SCHWARTZ invaded NELLE'S privacy by sending her an e-mail defaming LEWIS
27 without justification.

28 663. B.H.P.D. and SCHWARTZ invaded LEWIS'S privacy by distributing false and

1 defaming information without justification.

2 664. FANGARY invaded NELLE'S privacy by placing pleadings in her home mailbox.

3 665. WESTBROOK invaded the privacy of LEWIS, SCOTT, and LEWIS'S mother
4 (SCOTT'S grandmother).

5 666. For damages as a result of this Criminal Scheme, see ¶ 958.

6 **CRIMINAL SCHEME "B" PREDICATE ACTS**

7 667. CORNELL invaded LEWIS'S privacy by posting his private and personal information
8 on the internet.

9 668. CORNELL, MILLER, KEHOE, COX, HADDOCK, WILEMAN, PLUIM, FORD,
10 THOMAS, and VARGAS each invaded the privacy of one or more said Plaintiffs by posting
11 private, personal and/or inaccurate information about them on the internet.

12 669. CORNELL invaded the privacy of LEWIS, NELLE, TOMMY, Steve Daubenspeck,
13 and the F.B.I. by taping conversations with them without their permission.

14 670. MILLER spoofed NELLE by creating websites that pretended to be by NELLE giving
15 out false information. EXHIBIT 38.

16 671. PLUIM, THOMAS, VARGAS, WILEMAN, VARONOS, FORD and WALSH
17 invaded the privacy of LEWIS, LEWIS III, LORRAINE, and MINOR'S by harassing,
18 stalking, and/or threatening them, directly or indirectly.

19 672. On April 4, 2013, MILLER invaded the privacy of the PAEGEL'S and interfered with
20 the livelihood of TOMMY by posting a false PRLOG press release on a game "chat" where it
21 could be seen by at least 300 viewers.

22 673. WILEMAN, PLUIM, NIVEN and KING invaded NELLE'S privacy by conspiring
23 with MILLER who disparaged NELLE'S professional and private image on 5,000 websites.

24 674. CORNELL invaded the privacy of PAEGELS by coming into their home and office
25 while pretending to be a plaintiff and sharing private information with defendants.

26 675. CORNELL and WILEMAN created a website giving false information about LEWIS.

27 676. For damages as a result of this Criminal Scheme, see ¶ 958.

28 ///

1 **CRIMINAL SCHEME "C" PREDICATE ACTS**

2 677. THOMAS, PLUIM, and VARGAS invaded LEWIS'S privacy by failing to seal
3 LEWIS'S private medical records, as requested by LEWIS.

4 678. MILLER and CORNELL created a Wikipedia account in LEWIS'S name.

5 679. WALSH, CORNELL, FORD, WILEMAN and KEHOE posted negative and
6 threatening information about LEWIS on the internet.

7 680. HADDOCK and KEHOE gave false statements about LORRAINE to a Florida Court
8 at a child custody hearing.

9 681. For damages as a result of this Criminal Scheme, see ¶ 958.

10 **TWENTY-FIFTH CAUSE OF ACTION**

11 **COMPUTER FRAUD AND ABUSE, INTERNET HACKING, PHISHING, SPOOFING, AND**
12 **CYBER-CRIMES asserted by All Plaintiffs and DOE Plaintiffs 1-300 against CORNELL,**
13 **MILLER, NIVEN, KING, COX, WILEMAN, FORD, WALSH, KEITH, VARGAS,**
14 **VARONES, FLEMING, GRAMMER and DOE Defendants 1-300.**

15 (The ACTS; FTC Regulations; CIVIL RICO; T.C.A. § 39-14-601, et seq.; T.C.A. § 39-14-105;
16 Computer Fraud and Abuse Act, 18 U.S.C. 1030; Tennessee Common Law; U.S. Common
17 Law; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030)

18 682. By this reference, Plaintiffs herein incorporates each and every allegation of the
19 foregoing paragraphs 1-681 inclusive of this Complaint as if the same were hereat set forth in
20 full.

21 683. All Defendants committed cyber-crimes and fraud, directly or indirectly against all the
22 Plaintiffs and the public at large.

23 **CRIMINAL SCHEME "A" PREDICATE ACTS**

24 684. CORNELL hacked into all of LEWIS'S social media sites and his bank account where
25 she stole LEWIS'S money and property.

26 685. Evidence of CORNELL'S hacking remained on LEWIS'S laptop despite her attempts
27 to remove it.

28 686. NIVEN gave property belonging to the PAEGELS to others via the internet.

 687. For damages as a result of this Criminal Scheme, see ¶ 958.

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1 **CRIMINAL SCHEME "B" PREDICATE ACTS**

2 688. CORNELL hacked into LEWIS'S Facebook and e-mails; reopened LEWIS'S closed
3 Linked-in account; and LEWIS'S bank account.

4 689. CORNELL created numerous pseudonyms for the purpose of distributing divisive and
5 false information to/about Plaintiffs and the public at large.

6 690. MILLER created numerous web pages for the purpose of distributing divisive and
7 false information about Plaintiffs LEWIS and PAEGELS to the public at large.

8 691. For damages as a result of this Criminal Scheme, see ¶ 958.

9 **CRIMINAL SCHEME "C" PREDICATE ACTS**

10 692. MILLER, WILEMAN, and CORNELL hacked into Plaintiff's computers and
11 government agency databases.

12 693. CORNELL defrauded LEWIS over the internet.

13 694. WILEMAN and CORNELL created a Linked-In and Wikipedia account in LEWIS'S
14 name.

15 695. In June, 2012, LEWIS and NELLE discovered that both of their computers were
16 hacked by a resident of Monrovia, where MILLER and KING live.

17 696. LEWIS received(s) frequent notices from Facebook that his account was being
18 hacked. Facebook notified LEWIS whenever his password was about to be changed by an
19 unauthorized person(s).

20 697. CORNELL sent "spoofed" messages to others as if from LEWIS. As a result, LEWIS
21 received threats from WALSH, FORD and a Canadian national by the name of Herbert
22 O'Hearn.

23 698. A Defendant, who shall be named when the investigation is completed, also hacked
24 into the federal internal revenue service database in order to change LEWIS'S 2012 income tax
25 return. LEWIS was notified of same by the I.R.S. EXHIBIT 10.

26 699. CORNELL created an e-mail account in NELLE name using a pseudonym without
27 permission.

28 700. MILLER, CORNELL, WILEMAN, COX, KEITH and KING conspired to hack into

1 Plaintiffs' computers.

2 701. WILEMAN filed fraudulent court pleadings via computer in case no. 11-CV-08810-
3 GW obtainable to the public at large via the internet.

4 702. CORNELL, WILEMAN, and MILLER hacked into government criminal databases to
5 create a FALSE criminal "record" about LEWIS. The "record" contained a photograph that
6 was not LEWIS and a description with distinctly different physical features to LEWIS (eye and
7 hair color; height).

8 703. SCHWARTZ sent to NELLE via e-mail, a link to a paid criminal record site,
9 containing false information about LEWIS.

10 704. FORD placed private, false and/or defamatory statements about LEWIS, LEWIS III,
11 LORRAINE and MINORS on the internet.

12 705. WESTBROOK placed false and defamatory about SCOTT on the internet.

13 706. For damages as a result of this Criminal Scheme, see ¶ 958.

14 TWENTY-SIXTH CAUSE OF ACTION

15 HARASSMENT AND INTENTIONAL AND/OR NEGLIGENT INFILCTION OF
16 EMOTIONAL DISTRESS asserted by All Plaintiffs and DOE Plaintiffs 1-300 against All
17 Defendants and DOE Defendants 1-300.

18 (The ACTS; RICO; T.C.A. 39-17-308; T.C.A. 29-20-205(2); Restatement (second) of Torts §
19 46(l) (1965); See *Bain v. Wells*, 936 S.W.2d 618 (1997); The Identity Theft Enforcement and
20 Restitution Act of 2008, 18 U.S.C. §1030; and FTC Regulations; Tennessee Adult Protection
Act of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; Fl. Stat. §
22 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6;
23 T.C.A.71-6-120 et seq. Tenn. Adult Protection Act.)

24 707. By this reference, LEWIS herein incorporates each and every allegation of the
25 foregoing paragraphs 1-706 inclusive of this Complaint as if the same were hereat set forth in
26 full.

27 CRIMINAL SCHEME "A" PREDICATE ACTS

28 708. FANGARY harassed NELLE by making unlawful demands for "discovery" despite
her offer to provide him with a full and complete copy of discoverable material. To wit,
FANGARY demanded the original file unreturned, not a copy of it. See EXHIBIT 69.

1 709. FANGARY harassed NELLE by tampering with her personal, home mail and mailbox
2 as his manner of "serving" her with motions to compel discovery; FANGARY knew the
3 address of NELLE'S law office, however, he chose to violate federal law for tampering
4 instead. EXHIBIT 70.

5 710. SHERMAN suborned FANGARY'S harassment by ignoring it.

6 711. SHERMAN failed to adjudicate NELLE'S motion for sanctions. EXHIBIT 71 is the
7 Notice of SHERMAN'S ruling as compared to FANGARY'S e-mail demand, which contained
8 untrue facts as to what SHERMAN ordered.

9 712. SHERMAN harassed NELLE by stating that "it was water under the bridge" that
10 NELLE was improperly served; her mail and mailbox had been tampered with; and by
11 ignoring NELLE'S motion for sanctions, fees and costs based upon FANGARY'S discovery
12 violations, mailbox and mail tampering, improper service of process and his steadfast
13 *inexplicable refusal* to accept a copy of the entire file proffered from the outset. Instead
14 SHERMAN rewarded FANGARY for his felonious acts by imposing sanctions on NELLE
15 despite her offers to give the entire file to FANGARY eight months earlier. EXHIBITS 70 and
16 72.

17 713. FANGARY harassed NELLE by ignoring her "cease and desist." EXHIBIT 73.

18 714. FANGARY harassed NELLE by refusing to comply with the court procedures.

19 715. FANGARY harassed NELLE by refusing to give properly signed notice and order.

20 716. FANGARY harassed NELLE about the meaning of SHERMAN'S ruling, which was
21 controverted by the rules of discovery and SHERMAN'S actual statements in court and on his
22 minute order. EXHIBIT 74.

23 717. SHERMAN and FANGARY further harassed NELLE by denying her due process to
24 appeal SHERMAN'S defective ruling by their non-compliance with SHERMAN'S standing
25 order "**THE PREVAILING PARTY MUST PREPARE THE APPROPRIATE ORDER AND**
26 **GIVE ANY REQUIRED NOTICE.**" As the prevailing party, FANGARY was supposed to
27 give NELLE a signed order; without said order NELLE was unable to appeal SHERMAN'S
28 ruling.

1 718. In like manner, SHERMAN, PLUIM, COLE, WELCH and HAIGHT avoided appeals
2 by persistently and habitually failing to rule on properly filed motions and petitions.

3 719. COLE "misplaced" the file to prevent LEWIS from seeing documents filed by
4 CORNELL.

5 720. SCHWARTZ, B.H.P.D. and CORNELL conspired to harass LEWIS by falsely
6 claiming LEWIS had violated a court order.

721. CORNELL and COLE violated due process and conspired in order to get a restraining
7 order against LEWIS, however neither COLE nor any other judge in the L.A.S.C. system
8 issued a warrant for LEWIS'S arrest. The letter from the B.H.P.D. was issued for the sole
9 purpose to harass LEWIS and cause him undue distress in response to NELLE'S demands why
10 SCHWARTZ sent an offensive e-mail to her. EXHIBITS 59 and 76.
11

12 722. WESTBROOK harassed LEWIS'S mother via the phone for a period of 10 hours from
13 midnight on October 5, 2013 until 10:00 a.m. on October 6, 2013. LEWIS'S mother was
14 recovering from a heart attack at the time.

723 WESTBROOK told LEWIS'S mother that LEWIS was a "stalker" and a "felon."

16 724. When LEWIS'S mother phoned LEWIS about WESTBROOK'S harassing phone
17 calls, SCOTT called WESTBROOK to demand that he "cease and desist." WESTBROOK'S
18 response was "F***k you."

19 725. WESTBROOK harassed SCOTT on his Facebook by posting highly offensive
20 language of a disparaging nature. EXHIBIT 93.

726 WESTBROOK harassed SCOTT on the phone by yelling obscenities at him.

22. 727. WESTBROOK harassed LEWIS on the phone by threatening him and calling him
23. names: "celebrity stalker," "a felon," "a sick individual," and "an apple doesn't fall too far
24. from the tree." Apparently, CORNELL has convinced WESTBROOK that she is a
25. "celebrity."

²⁶ 728 For damages as a result of this Criminal Scheme, see ¶ 958.

27 | CRIMINAL SCHEME "B" PREDICATE ACTS

729 CORNELL, MILLER, WILEMAN, JUNCO, TORO, VARONOS, PLUIM,

1 THOMAS, HADDOCK, KEHOE, and VARGAS harassed and intentionally and/or negligently
2 inflicted severe emotional distress upon all Plaintiffs.

3 730. CORNELL, KEHOE, MILLER and COX made public and intentionally damaging
4 statements about LEWIS, PAEGELS, MINORS, and LORRAINE using the internet and social
5 media. All of Plaintiffs' demands to cease and desist were ignored.

6 731. VARGAS harassed TOMMY by forcing him to leave the courtroom without
7 justification.

8 732. PLUIM harassed NELLE, TOMMY and LEWIS by threatening to have them removed
9 from court hearings for trying to correct lies being told by WILEMAN, MILLER, VARONOS,
10 CORNELL, ROBERTS, JUNCO and KELETI.

11 733. MILLER sexually harassed NELLE at the January 16, 2012 "meet and confer" by his
12 persistent use of sexually foul language. WILEMAN made no effort to curb him; when
13 NELLE'S witness politely asked MILLER to "be respectful", MILLER and WILEMAN
14 jumped down the witnesses' throat calling him a "dog" and telling him to be quiet or leave.
15 EXHIBIT 14-X & Y.

16 734. MILLER harassed and intentionally inflicted severe emotional distress on NELLE by
17 filing 2 false Bar complaints, by filing false Sheriff and Police reports, by filing false and
18 disparaging pleadings, by creating false web pages and posting false and damaging statements
19 on a webpage for NELLE that he also created, and by distributing—by his own admission—
20 false statements about her to 5000 internet sites. EXHIBIT 14-Y.

21 735. PLUIM and VARGAS harassed NELLE and LEWIS by having three sheriffs stand
22 behind them at a hearing in violation of due process.

23 736. For damages as a result of this Criminal Scheme, see ¶ 958.

24 **CRIMINAL SCHEME "C" PREDICATE ACTS**

25 737. HADDOCK caused LORRAINE extreme emotional distress by conspiring with
26 KEHOE, CORNELL and COX to post private information about her and MINORS over the
27 internet.

28 738. HADDOCK used said posting as an excuse to kidnap MINORS 1 and 2 from the

1 custody of LORRAINE.

2 739. Such information also endangered LEWIS'S health and well-being by causing LEWIS
3 undue stress from fear of assault by predators and friends of CORNELL, KEHOE and COX.

4 740. VARONES harassed LEWIS in court when he threatened LEWIS by saying: "LEWIS
5 is a DEAD MAN." PLUIM, VARGAS and THOMAS neither said nor did anything.

6 741. HADDOCK harassed MINORS 1 and 2 by "spiriting" them away from their mother
7 and forcing them to sleep on the floor and go to school without shoes.

8 742. HADDOCK harassed MINOR 2 by forcing her to lie to school authorities about
9 LORRAINE and her fiance.

10 743. SCHWARTZ sent NELLE via e-mail a link to a *paid* website showing LEWIS as a
11 felon following initiating the false arrest by Knoxville Sheriff based upon FARGO'S pretext
12 that LEWIS had not paid off his automobile. When NELLE demanded an explanation for
13 same from SCHWARTZ, B.H.P.D., the Mayor of the City of Beverly Hills, LEWIS received
14 notice of a Warrant for LEWIS'S arrest was sent to him that turned out to be a fraud.
15 EXHIBIT 59. Clearly, SCHWARTZ, B.H.P.D., CORNELL, and FARGO conspired to get a
16 correct arrest "mug shot" of LEWIS available on the internet.

17 744. When NELLE demanded an explanation of such act from SCHWARTZ, the Beverly
18 Hills Police dept. harassed LEWIS by sending him a letter about a (false) warrant for
19 LEWIS'S arrest. EXHIBIT 76 shows the letter and the case summary for the only case in
20 Southern California against LEWIS. NOTE: The letter is revelatory in that it states that
21 LEWIS'S "cooperation" will determine the court's NEXT action—thus putting the cart before
22 the horse—thus begging the question of how B.H.P.D. speaks for the court? No Warrant was
23 included with the phony letter.

24 745. This sort of harassment by corrupt law enforcement is consistent with known
25 techniques employed by organized crime to add pressure. This sort of "pattern" of activities is
26 one reason why Congress empowered individuals with the Civil RICO Act. Attacking and
27 endangering children is also commonly used by members of Criminal Schemes (organized
28 crime) to bring about their desired results.

1 746. For damages as a result of this Criminal Scheme, see ¶ 958.

2 TWENTY-SEVENTH CAUSE OF ACTION

3 FILING FALSE REPORTS WITH GOVERNMENT AGENCIES asserted by ALL
4 PLAINTIFFS and DOE Plaintiffs 1-300 against ALL DEFENDANTS and DOE Defendants 1-
5 300.

6 (The ACTS; RICO; T.C.A. § 39-16-502; U.S. common Law; The Identity Theft Enforcement
7 and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulations; Tennessee Adult Protection Act
8 of 1978, T.C.A CH. 6, PT. 1 §§ 71-6-101 and 120; Ariz. Revised Stat. §46-455; Fl. Stat. §
9 825.102; Ca. Welfare and Institutions Code § 15610.07; Ca. Code of Civ. Proc. § 527.6;
10 T.C.A.71-6-120 et seq. Tenn. Adult Protection Act

11 747. By this reference, LEWIS herein incorporates each and every allegation of the
12 foregoing paragraphs 1-746 inclusive of this Complaint as if the same were hereat set forth in
13 full.

14 CRIMINAL SCHEME "A" PREDICATE ACTS

15 748. For at least the past seven years, PLUIM, SHERMAN, COLE, HAIGHT, and
16 WELCH all filed their 700's with false information on each. EXHIBIT 78. Any untrue
17 statements on said forms constitutes a felony for each falsity, yet HAIGHT, COLE, and
18 WELCH, of said Defendants left the form virtually blank, HAIGHT, WELCH, and
19 SHERMAN claimed no spouse with any income or assets, and all said Defendants claimed no
20 retirement account except for PLUIM, who claimed no retirement account until 2012 when 12
separate accounts suddenly appeared totaling an amount invested as between \$460,000 and
\$4,600,000, an impossibility *legally*.

21 749. PLUIM'S stock portfolio increased in range from \$193,000-\$1,930,000 in 2011 to
22 \$836,000-\$8,360,000 in 2012. This is another fiscal impossibility based upon market
23 conditions. And COLE'S forms were all amended in 2012 with still inconsistencies and false
24 reports.

25 750. It has been shown that WILEMAN, MILLER, VARONOS, FLEMING, THOMAS,
26 VARGAS, KING, INS, CORNELL, HAYELAND, SIMMONS, GRAMMER, JACKSON,
27 MULLIGAN, JUNCO, TORO, KING, KELETI, YAO, HADDOCK, COX, KEITH, and
28 KEHOE all conducted business illegally in order to cheat the public and evade federal, state,

1 county and/or local taxes.

2 751. Said Defendants failed to pay for any license.

3 752. WESTBROOK admitted to having filed a (false) police report against SCOTT falsely
4 accusing him of "theft."

5 753. STELL submitted a copy of falsified bank records to CAMPION, who further falsified
6 the bank records and submitted those records to the San Bernardino Court and WELCH.

7 754. WELCH, BASLE, and SLOUGH accepted said obviously falsified bank records
8 (pages missing) without question or challenge. As a direct result, the heirs lost a property with
9 \$250,000.00 equity.

10 755. Said bank records clearly showed theft of \$10,000.00 by decedent's girlfriend after
11 DOD that STELL and CAMPION breached their duties and committed malfeasance as a
12 "cover up."

13 756. WELCH permitted CAMPION and STELL to stall filing an inventory and appraisal
14 for two years beyond the statutory requirement. At trial, NELLE was arbitrarily precluded
15 from addressing the inventory issues by HAIGHT. The loss in value to the property is owed
16 entirely to such wastes of time.

17 757. CAMPION, STELL and HAIGHT conspired to falsely report the estate accounting to
18 the heirs. HAIGHT accepted obviously false, unsigned documents.

19 758. SCHWARTZ and B.H.P.D. falsely issued an arrest Warrant against LEWIS.

20 759. CORNELL made false allegations about LEWIS and e-mailed those allegations to
21 sheriffs, police departments, judges, district attorney, and the Federal Bureau of Investigation.
22 EXHIBIT 79.

23 760. Neither SCHWARTZ nor any other police office or law enforcement agency
24 questioned LEWIS about CORNELL'S allegations. Instead, LEWIS has experienced just the
25 opposite; some law enforcement officers complained to LEWIS about CORNELL'S "crazy"
26 claims.

27 761. None of CORNELL'S allegations against LEWIS or any other Plaintiff had any
28 validity. CORNELL'S intent was to obstruct justice by casting a shadow over Plaintiffs for the

1 illegal acts she had herself committed. Similarly, VARONOS, MILLER, WILEMAN,
2 PLUIM, KING, KELETI, YAO, HADDOCK, and KEHOE also made false statements about
3 Plaintiffs for the same reason.

4 762. MILLER filed numerous false reports to various agencies against NELLE in his
5 attempt to get NELLE as coercion and blackmail. No action was ever taken against NELLE
6 by any agency despite MILLER'S repeated efforts whereby MILLER continually escalated the
7 FALSE facts of his complaints in a futile effort to get his desired results.

8 763. KING filed false federal "EIN" numbers with the City of San Marino for the two
9 businesses belonging to KING that they believe to be legitimate, BODY SLIMMING
10 EXPERTS and ADVANCED HEALTH CONCEPTS. EXHIBIT 80.

11 764. WILEMAN filed a case in Los Angeles Superior Court against each of the PAEGELS
12 and their process server that included MILLER'S false police report. WILEMAN failed to
13 show up for the first hearing at which the judge ruled against him for making improper claims
14 and improper service of process.

15 765. FORD falsely claimed to be disabled and has filed false documents with the state of
16 Massachusetts and the federal government.

17 766. FARGO conspired with CORNELL, WILEMAN, and MILLER to falsely arrest
18 LEWIS for supposedly not paying off the vehicle he had received a clear title to.

19 767. Following several months of litigation, LEWIS was cleared of all charges, because
20 FARGO knew from the outset that LEWIS had paid off the vehicle. EXHIBIT 94.

21 768. LEWIS believes that each Defendant has participated Criminal Schemes to unduly vex
22 and pressure Plaintiffs.

23 769. For damages as a result of this Criminal Scheme, see ¶ 958.

24 **CRIMINAL SCHEME "C" PREDICATE ACTS**

25 770. CARMAX reported to the Knoxville Sheriff that LEWIS stole an automobile that was
26 fully paid for, causing LEWIS to be arrested and forced to hire an attorney to defend himself
27 for several months.

28 771. Said false report resulted in LEWIS mug shot being circulated by SCHWARTZ over

1 the internet after someone putting it out on a paid site.

2 772. CORNELL, VARONOS, and WILEMAN made false statements about LEWIS to the

3 court in GC047909 accusing LEWIS of having two felony convictions and a two-year jail

4 sentence for internet fraud.

5 773. WILEMAN paid the court for a NO BAIL WARRANT for LEWIS'S arrest, which

6 PLUIM issued based solely on WILEMAN'S say so.

7 774. Said warrant was added to the case summary by PLUIM, THOMAS and VARGAS.

8 775. CORNELL filed false reports against LEWIS with COLE, the Santa Monica Superior

9 Court, the Beverly Hills Police Department, the Los Angeles Sheriff's Dept., the Temple City

10 Sheriff, and the F.B.I.

11 776. CORNELL conspired with SCHWART and B.H.P.D. to falsely arrest LEWIS.

12 777. MILLER, COX, WALSH, KEHOE and FORD repeated said false reports on their

13 social internet sites as though the information was true.

14 778. Conspiring with CORNELL, FORD also filed a false report with the Arlington,

15 Massachusetts Police Department against LEWIS.

16 779. CORNELL, MILLER, JUNCO, WILEMAN, YAO, ROBERTS, GRAMMER

17 (through his attorney) and KELETI made false in-court statements and/or in pleadings about

18 NELLE and/or LEWIS.

19 780. PLUIM refused to substantiate the Warrant with facts and refused to accept

20 exculpatory evidence.

21 781. No Warrant was ever served on LEWIS, who appeared for his hearing on October 19,

22 2012.

23 782. The Warrant "fiascos" clearly show how organized crime depends on judges, clerks,

24 attorneys, law enforcement and other "crooks" in order to carry out their myriad Criminal

25 Schemes.

26 783. For damages as a result of this Criminal Scheme, see ¶ 958.

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TWENTY-EIGHTH CAUSE OF ACTION

INSURANCE BAD FAITH asserted by LEWIS, PAEGELS, TBCS and DOE Plaintiffs 1-300 against INS, WILEMAN, YAO, KELETI, NEWELL, PLUIM, THOMAS, VARGAS, ROBERTS, MILLER, JUNCO, VARONOS, KING, and DOE Defendants 1-300.

(THE ACTS; RICO; T.C.A. § 56-7-106; Tennessee Consumer Protection Act §23-3-112; 15 U.S.C. §§ 1011-15; U.S. Common Law; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030.)

784. By this reference, LEWIS herein incorporates each and every allegation of the foregoing paragraphs 1-783 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "B" PREDICATE ACTS

785. INS, WILEMAN, NEWELL, and KING conspired to avoid the payment of KING'S insurance claim based upon her "default" in GC047909.

786 INS ignored NEILL'S requested proof as to WILEMAN'S hiring date.

787. PLUIM and WILEMAN stated that they were both paid a "flat fee" for their respective services. EXHIBIT 2-CM:24-28 thru 2-CN:1-6.

788. PLUIM, THOMAS, KELETI, VARGAS, WILEMAN, ROBERTS, MILLER, JUNCO
and VARONOS participated in *ex parte* communications on December 14, 2012 AFTER
KING'S dismissal. There was no valid reason why WILEMAN attended court that day other
than INS bad faith—to ensure that INS got *what it paid for*.

⁷⁸⁹ For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "C" PREDICATE ACTS

790. INS and KING authorized the wrongful actions of PLUIM, THOMAS, VARGAS, WILFMAN NEWELL, KELETI and YAO against LEWIS.

⁷⁹¹ For damages as a result of this Criminal Scheme, see ¶ 958.

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TWENTY-NINTH CAUSE OF ACTION

BUSINESS INTERFERENCE asserted by LEWIS, LEWIS III, TBCS, PAEGELS, LORRAINE, and DOE Plaintiffs 1-300 against CORNELL, KEHOE, COX, KEITH, MILLER, WILEMAN, YAO, KELETI, NEWELL, HADDOCK, KING, PLUIM, and DOE Defendants 1-300.

(The ACTS; RICO; T.C.A. § 47-50-109; *Lumley v. Gye*, 2 El. & Bl. 216, 118 Eng. Rep. 749 (Q.B. 1853); U.S. Common Law; *Hutton v. Waters*, 132 Tenn. (5 Thompson) 527, 179 S.W. 134 (1915); The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; FTC Regulation.)

792. By this reference, Plaintiffs herein incorporates each and every allegation of the foregoing 1-791 paragraphs inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS

793. VARONOS, FLEMING, CORNELL, MILLER, KING, NIVEN, JUNCO, and TORO
interfered with the businesses owned/operated by TBCS/PAEGELS.

794. KING, NIVEN, MILLER, VARONOS, FLEMING and CORNELL interfered with TBCS and PAEGELS by stealing their money and property.

795. NIVEN interfered with TBCS/PAEGELS by giving/selling their videotapes to MILLER/KING.

796 MILLER and KING interfered with TBCS by stealing their videotapes.

⁷⁸⁷ MILLER and KING ruined third-party assets under contract with TBCS.

⁷⁹⁸ For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME, "B" PREDICATE ACTS

799. MILLER created a blog in the name of NELLE without her permission and wrote defamatory material about NELLE while he was pretending to be a "visitor" to the blog. In so doing, MILLER spread defamatory statements about NELLE throughout the internet without her knowing it, which severely disrupted her law practice.

800. MILLER and PLUIM conspired to destroy NELLE'S reputation and law practice by making false statements in court that neither NELLE nor any of the PAEGEL'S were allowed to refute on the record. PLUIM made derogatory statements on the record at MILLER'S small

1 claims's case based solely on MILLER'S perjured testimony. The PAEGEL'S were precluded
2 from cross-examining MILLER or speaking in their defense in any way. This was a set-up
3 between MILLER and PLUIM for the sole purpose of damaging TBCS and the PAEGEL'S,
4 particularly NELLE. EXHIBIT 2-A thru L. This occurred after MILLER had been served
5 with the GCO47909 complaint.

6 801. HADDOCK, KEHOE, CORNELL, MILLER, WILEMAN, COX, and KEITH
7 reported false information to the employers of LEWIS III and LORRAINE, directly resulting
8 in their terminations.

9 802. For damages as a result of this Criminal Scheme, see ¶ 958.

10 **CRIMINAL SCHEME "C" PREDICATE ACTS**

11 803. CORNELL, COX, MILLER, FORD, HADDOCK and KEHOE conspired to get
12 LEWIS III and LORRAINE terminated from their respective employment and forced to move
13 their residences.

14 804. CORNELL, COX, MILLER, FORD, HADDOCK and KEHOE conspired and
15 contacted FEMA making false accusations against LEWIS III directly resulting in LEWIS III
16 being fired from his employment.

17 805. CORNELL, COX, MILLER, FORD, HADDOCK and KEHOE conspired and made
18 three separate contacts with Angelo's Pizza in Englewood, Florida stating that they were from
19 the Los Angeles Times wanting LEWIS III'S contact information and work information.
20 Because of these contacts, LEWIS III was unable to continue working at Angelo's Pizza.

21 806. Said relocations of LEWIS III and LORRAINE caused LEWIS to be deprived of the
22 company of his grandchildren.

23 807. Said Defendants so harassed LEWIS as to disrupt his legal research business.

24 808. For damages as a result of this Criminal Scheme, see ¶ 958.

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THIRTIETH CAUSE OF ACTION

DEFAMATION (LIBEL, SLANDER, & FALSE LIGHT INVASION OF PRIVACY asserted by All Plaintiffs and DOE Plaintiffs 1-300 against SCHWARTZ, CORNELL, COX, KEITH, VARONOS, FLEMING, ROBERTS, KELETI, KEHOE, GRAMMER, INS, WALSH, FORD, NEWELL, PLUIM, MILLER, YAO, WILEMAN, KING and DOE Defendants 1-300.

(The ACTS; RICO; Restatement (2D) of Torts §§ 652E, 558, 578 (1977); U.S. Common Law; The Identity Theft Enforcement and Restitution Act of 2008, 18 U.S.C. §1030; and FTC Regulations.)

809. By this reference, Plaintiffs herein incorporates each and every allegation of the foregoing paragraphs 1-808 and EXHIBITS 1-95 inclusive of this Complaint as if the same were hereat set forth in full.

810. As discussed *supra*, said Defendants conspired to and made, either directly or through their counsel, defamatory statements about the Plaintiffs on the internet, in court pleadings, at court hearings, and in person causing irreparable harm.

CRIMINAL SCHEME, "A" PREDICATE ACTS

811. SCHWARTZ, a detective with the Beverly Hills Police Dept., sent to NELLE via e-mail a link to a paid website showing incorrect and defamatory information about LEWIS.

WESTBROOK said SCOTT had the disease known as aids.

813. WESTBROOK told LEWIS and SCOTT that he had spoken to COX and CORNELL and that "I know all about your dad, he's a celebrity stalker and a felon, that he has Leukemia and I hope he f***king dies."

WESTBROOK called LEWIS "an f***ing asshole."

815. WESTBROOK defamed LEWIS on the phone in front of SCOTT and NELLE. WESTBROOK was informed that the conversation was going to be taped and stated: "I don't give a s**t." LEWIS cautioned WESTBROOK that he (LEWIS) was the P.A.G. in this case and informed WESTBROOK that he would be brought into the case if he continued. WESTBROOK responded: "I don't give a s**t." This language was also heard by MINOR

816 Unbeknownst to WESTBROOK, he revealed information that could only have come

1 from KEHOE.

2 817. WESTBROOK admitted in front of SCOTT, NELLE and RICHARD that he had
3 received documents about LEWIS from COX.

4 818. WESTBROOK defamed SCOTT and LEWIS to a third party.

5 819. For damages as a result of this Criminal Scheme, see ¶ 958.

6 **CRIMINAL SCHEME "B" AND "C" PREDICATE ACTS**

7 820. CORNELL intentionally distributed false and defamatory information in written form
8 in e-mails, on her Facebook, on twitter, on her blog lydiacornell.com, on Wikipedia, on
9 LEWIS'S Facebook, on the Huffington Post, on TMZ.com, on Rip-OffReport.com.

10 821. CORNELL, WALSH, FORD, COX, and KEITH to defame LEWIS on numerous
11 internet sites, some of which cannot be removed (specifically, Rip-OffReport.com).

12 822. WILEMAN, KELETI, INS, FIN INST, KING, MILLER, VARONOS, GRAMMER,
13 PLUIM and CORNELL conspired to openly defame LEWIS at hearings and in pleadings.

14 823. CORNELL intentionally distributed false and defamatory information at hearings
15 about NELLE and LEWIS.

16 824. MILLER intentionally distributed false and defamatory information orally in hearings
17 about TBCS/PAEGELS and NELLE.

18 825. MILLER admitted to distributing the false and defamatory statements about NELLE
19 by PLUIM to 5000 internet sites.

20 826. MILLER'S false police, sheriff, and California State Bar complaints are filled with
21 defamatory statements about the PAEGELS and in particular NELLE.

22 827. LEWIS III was terminated from his employment based solely upon defamatory
23 statements made to his employer by CORNELL, COX, and MILLER.

24 828. For damages as a result of this Criminal Scheme, see ¶ 958.

25 **CRIMINAL SCHEME "C" PREDICATE ACTS**

26 829. WILEMAN intentionally distributed false and defamatory material to PLUIM and
27 PAEGEL in order to support his claim that LEWIS was a felon.

28 830. CORNELL engaged in a widespread defamation campaign against LEWIS.

1 831. SCHWARTZ intentionally distributed false and defamatory information about LEWIS
2 via the internet. EXHIBIT 59. When demanded to know SCHWARTZ'S justification, The
3 City of Beverly Hills attributed it to "spoofing," a second demand resulted in the false Warrant
4 being issued.

⁵ 832 For damages as a result of this Criminal Scheme, see ¶ 958.

THIRTY-FIRST CAUSE OF ACTION

7 VIOLATIONS OF THE RULES OF DISCOVERY asserted by LEWIS, PAEGELS, TBCS and
8 DOES 1-300 against SHERMAN, FANGARY, HAIGHT, STELL, WELCH, EDMON,
9 SLOUGH, BASLE, GOLDEN, KRATTI, BORRIS, CAMPION, COLE, WILEMAN,
MILLER, CORNELL, PLIJM, INS, JUNCO, TORO and DOES 1-300 INCLUSIVE.

(The ACTS; RICO; T.C.A. § 26.02)

11 833. By this reference, Plaintiffs herein incorporates each and every allegation of the
12 foregoing paragraphs 1-832 inclusive of this Complaint as if the same were hereat set forth in
13 full.

CRIMINAL SCHEME "A" PREDICATE ACTS

15 834. FANGARY demanded possession of the *original* files of NELLE'S clients.
16 FANGARY filed motions to force NELLE into relinquishing the original files arguing that he
17 was entitled to the original files under the law, which was untrue.

18 835. At hearing, SHERMAN corrected FANGARY'S misinterpretation of the rules of
19 discovery, yet SHERMAN, GOLDEN and BORRIS conspired to sanction NELLE for offering
20 copies of said files instead of complying with FANGARY'S unlawful demands.

836. COLE, KRATTI, WESLEY and EDMON violated the rules of discovery by denying
LEWIS access to the file and evidence submitted by CORNELL.

23 837. COLE, KRATTI, WESLEY and EDMON conspired to obviate the rules of discovery
24 and LEWIS'S rights to due process by relying on CORNELL'S Facebook evidence, which she
25 knew LEWIS could not see via CourtCall and had not received.

²⁶ STELL and CAMPION refused to comply with reasonable discovery requests.

27 839. WELCH, SLOUGH and BASLE conspired with STELL and CAMPION to deny
28 NELLE'S motion to compel reasonable discovery requests.

1 840. HAIGHT, SLOUGH and BASLE conspired with STELL and CAMPION to deny
2 NEILLE'S motion to enforce reasonable discovery requests and subpoena.
3

241 ROBINSON refused to return to TBCS/PAEGELS their documents and/or file.

⁸⁴² For damages as a result of this Criminal Scheme, see ¶ 958.

CRIMINAL SCHEME "B" PREDICATE ACTS

6 843. Said Defendants violated the rules of discovery by refusing to comply with said
7 Plaintiffs reasonable discovery requests. EXHIBIT 14-AZ thru AAD.

844. LEWIS, as the Private Attorney General in Case No. GC047909, requested discovery
from CORNELL, MILLER, KING, WILEMAN, YAO. None of these Defendants complied
with any reasonable request.

11 845. PLUIM, EDMON, WESLEY and KRATTI subverted LEWIS'S work as PAG by
12 granting WILEMAN'S request for a protective order.

13 846. Upon LEWIS'S demand for the return of his laptop computer, CORNELL used said
14 computer to hack into LEWIS'S bank records, Facebook accounts and e-mails. Along with the
15 computer, CORNELL gave LEWIS a "thumb drive" with evidence of her illegal wiretapping.
16 Said wiretapping included a conversation with Adam Storer of the Los Angeles Bureau of the
17 Federal Bureau of Investigation and others (unbeknownst to them). This EXHIBIT/thumb
18 drive will be submitted to the Court under seal.

19 847. KING, MILLER, JUNCO, WILEMAN, CORNELL and TORO refused to comply
20 with any reasonable discovery requests. PLUIM, EDMON, WESLEY and KRATTI excused
21 said defendant's compliance by overruling motions and ignoring demands.

22 848. WILEMAN failed to draft a Discovery Plan, as he had agreed to do, for submission to
23 the court.

24 849. SLOUGH, BASLE, WELCH, HAIGHT, CAMPION and STELL violated state
25 discovery rules by refusing to give heirs proof of insurance proceeds and other documents vital
26 to the best interests of the heirs.

850 BORRIS failed to properly supervise SHERMAN.

⁸⁵¹ GOLDEN failed to advise SHERMAN as to NELLE'S motion for sanctions and fees.

1 based upon her claim of mail tampering and mailbox tampering, violations of discovery rules,
2 etc.

3 852. BORRIS failed to properly supervise WELCH and HAIGHT.

4 853. BASLE failed to properly advise WELCH and HAIGHT regarding discovery,
5 sanctions, and other violations of federal and state law.

6 854. For damages as a result of this Criminal Scheme, see ¶ 958.

7 **CRIMINAL SCHEME "B" PREDICATE ACTS**

8 855. EDMON failed to properly respond to LEWIS'S request that she investigate PLUIM.

9 856. EDMON and WESLEY failed to properly supervise PLUIM and COLE.

10 857. For damages as a result of this Criminal Scheme, see ¶ 958.

11 **THIRTY-SECOND CAUSE OF ACTION**

12 **INCOME TAX FRAUD AND EVASION asserted by ALL Plaintiffs and DOE Plaintiffs 1-300**
13 **against ALL Defendants and DOE Defendants 1-300 Inclusive.**

14 (The ACTS; IRC §7201; RICO)

15 858. By this reference, Plaintiffs herein incorporates each and every allegation of the
16 foregoing paragraphs 1-857 inclusive of this Complaint as if the same were hereat set forth in
17 full.

18 **CRIMINAL SCHEME "A" PREDICATE ACTS**

19 859. All Defendants intentionally evaded paying taxes thereby committing tax fraud on
20 cities, counties, states and the Department of the Treasury ("I.R.S.") by taking bribes and
21 payoffs and/or conducting fraudulent business.

22 860. Presumably, PLUIM, SHERMAN, HAIGHT, COLE and WELCH received "payoffs"
23 because they all made rulings that were contrary to local, state, and federal laws and rules.
24 Said payoffs were not listed on their form 700 filed with the California Fair Political Practices
25 Commission and were untaxed. EXHIBIT 78.

26 861. PLUIM claimed twelve (12) new retirement accounts in 2012 far in excess of I.R.S.
27 guidelines. EXHIBIT 78-BN thru BO.

28 862. PLUIM claimed to invest in a company that does not exist; his true involvement is in a

1 company that he deliberately mis-identified on his "700's."

2 863. FIN INST committed tax fraud by receiving money from bribes and taken by fake and
3 fraudulent businesses.

4 864. FIN INST failed to properly supervise bank users, MERITUS and BEATY.

5 865. Defendants claimed to own and operate business concerns that are not legitimate in
6 order to receive money without being taxed.

7 866. VARONOS, FLEMING, GRAMMER, KING, MILLER, CORNELL, BLEU,
8 JUNCO, TORO, HAYELAND, SIMMONS, JACKSON, MULLIGAN, MERITUS, BEATY,
9 COX, KEITH, KEHOE, PLUIM, BEATY, INS., FIN INST, failed to report income and/or
10 benefits they received by and through their fraudulent business schemes.

11 867. MILLER and TORO failed to report income they received from TBCS/PAEGELS on
12 their federal income taxes. EXHIBIT 50.

13 868. MILLER failed to report income he received from TBCS/PAEGELS on his state of
14 California income tax. EXHIBIT 51.

15 869. MILLER intended to defraud the state of California and the Dept. of the Treasury by
16 refusing to give NELLE his tax identification number, claiming to be a "corp" as though that
17 would excuse him from taxation. EXHIBIT 52.

18 870. MILLER deposited money from TBCS/PAEGELS into the MILLER FAMILY
19 TRUST with the intention of evading income taxes.

20 871. MILLER sold pirated videos via the internet.

21 872. KING advertised multiple unlicensed businesses for the purpose of evading city,
22 county, state and federal taxes.

23 873. WILEMAN, VARONOS, CORNELL, HAYELAND, HADDOCK and MILLER have
24 prior instances of income tax evasion and fraud.

25 874. GRAMMER and CORNELL received advertising via Variety magazine.

26 875. GRAMMER, CORNELL and BLEU received advertising via MYEZTV, TODHD,
27 STAROPOLY, and ESTARTV.

28 876. VARONOS, TORO, JUNCO, FLEMING, ROBINSON, WORMLEY, MILLER, and

1 KING stole money and property from TBCS/PAEGELS.

2 877. FIN INST were complicit in Defendants' tax fraud and evasion by *inter alia* receiving
3 money from fake businesses.

4 878. ROBINSON was suspended from the practice of law at the time he took a retainer for
5 legal work from TBCS/PAEGELS. Therefore, he could not have reported the income on his
6 taxes.

7 879. WORMLEY knew that the TBCS/PAEGEL retainer was taken as the result of fraud.
8 WORMLEY took receipt of stolen money because no legal work was ever performed by either
9 ROBINSON or WORMLEY.

10 880. JUNCO and TORO did not report the income derived from their involvements with
11 TODHD, MYEZTV, or GREEN NETWORK, which they received from TBCS/PAEGELS.

12 881. CORNELL did not report income derived from selling material over the internet.
13 EXHIBIT 67.

14 882. CORNELL rented rooms in her residence, but did not report the income on her taxes
15 or pay the city license fee. EXHIBIT 68.

16 883. CORNELL receives donations made to several fraudulent businesses.

17 884. MILLER advertised his businesses address to be in the City of San Marino, yet he
18 does not have a city, county, or state license to conduct those businesses. EXHIBIT 80.

19 885. KING advertised her businesses address to be in the City of San Marino, yet she does
20 not have a city, county, or state license to conduct those businesses. EXHIBIT 80.

21 886. For damages as a result of this Criminal Scheme, see ¶ 958.

22 **CRIMINAL SCHEME "B" PREDICATE ACTS**

23 887. INS were complicit in paying bribes and therefore accomplices to tax fraud by payees.

24 888. MILLER told PLUIM that HITMAN was a California company that was "not real."
25 PLUIM was complicit in MILLER'S tax fraud Criminal Scheme. The record is replete with
26 similar contradictions to law made by MILLER and PLUIM.

27 889. SIMMONS and HAYELAND failed to report income they received by and through
28 SIMMONS'S unregistered and unlicensed businesses.

1 890. COX evaded income taxes by conducting her business on-line. COX has not
2 registered or licensed her business with the city, state, or federal governments.

3 891. KEITH'S computer business unregistered and unlicensed.

4 892. LEWIS alleges and believes that the foregoing Criminal Schemes cheated local, state
5 and federal governments—and the public at large—of funds and property while evading taxes
6 and in an ongoing Criminal Scheme to commit tax fraud. The extent of each Defendant's tax
7 fraud will be ascertained through discovery.

8 893. The tax and bank records for all Defendants will assist in showing the extent of each
9 Defendant's liability for tax fraud. Clearly, any Defendant who either suborned evasion,
10 conspired to hide income, or laundered money wrongfully received has committed taxation
11 fraud.

12 894. For damages as a result of this Criminal Scheme, see ¶ 958.

THIRTY-THIRD CAUSE OF ACTION

14 **MONEYLAUNDERING asserted by ALL Plaintiffs and DOE Plaintiffs 1-300 against ALL**
15 **Defendants and DOE Defendants 1-300 inclusive.**

16 **(18 U.S.C. 1956; The ACTS; RICO; T.C.A § 39-14-903; 18 U.S.C. §1030)**

17 895. By this reference, Plaintiffs herein incorporates each and every allegation of the
18 foregoing paragraphs 1-894 inclusive of this Complaint as if the same were hereat set forth in
19 full.

CRIMINAL SCHEMES "A" AND "B" PREDICATE ACTS

21 896. Said Defendants laundered money taken illegally.

22 897. For damages as a result of this and all Criminal Schemes, see ¶ 958.

THIRTY-FOURTH CAUSE OF ACTION

24 **COPYRIGHT INFRINGEMENT asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE**
25 **Plaintiffs 1-300 against Defendants MILLER, KING, NIVEN, VARONOS, CORNELL and**
DOE Defendants 1-300 Inclusive and DOE Defendants 1-300 Inclusive.

26 **(The ACTS; CIVIL RICO; TN Common Law)**

27 898. By this reference, Plaintiffs herein incorporates each and every allegation of the
28 foregoing paragraphs 1-897 inclusive of this Complaint as if the same were hereat set forth in

1 full.

2 **CRIMINAL SCHEME "A" PREDICATE ACTS**

3 899. MILLER sold PAEGELS/TBCS videotapes on the internet. EXHIBITS 49 and 58.

4 900. CORNELL infringed on LEWIS'S copyrighted photographs by taking them from his
5 Facebook page without his express permission despite his warning.

6 901. LEWIS through his investigation as the PAG has been informed and believes, and
7 thereon alleges, that at all times mentioned herein Defendant CORNELL marketed, the shows
8 known as "Too Close For Comfort," without their owners' permission. The shows are owned
9 by D.L.T., LTD. of 124 E. 55th St., New York, NY 10019. According to legal counsel for
10 D.L.T., CORNELL had no such permission.

11 902. PAEGELS and TBCS own exclusive rights to the material that was videotaped by the
12 PAEGELS—stolen by MILLER and KING—because all other celebrity performers at the
13 EVENT had waived their right to copyright ownership of their material.

14 903. PAEGELS and TBCS were given express and/or implied permission by Variety
15 EVENT organizers to videotape the red carpet, the rehearsals, the show itself, and the
16 backstage interviews and were freely given their own EVENT badges and access to all areas of
17 the venue.

18 904. All content on all of the PAEGELS videotapes were and are original.

19 905. KING and MILLER and their agents digitized said copyrighted material videotaped at
20 the Variety EVENT on December 4, 2010 as well as other copyrighted material videotaped on
21 or about September 1, 2010 through December 4, 2010 at NIVEN'S studio, CarStar/Nuke the
22 Fridge, Frank and Sons, Extreme Green, and Interviews of KING, Randy Sotile, John Carter,
23 and Walter Coulter and sold them. MILLER placed PAEGELS' material on onePakistan.com,
24 Prismotube, tube.7s-b.com, mahaythi.com, bluesplayer.co.uk., ISPs, Youtube and Facebook
25 without their permission. EXHIBIT 49.

26 906. For damages as a result of this and all Criminal Schemes, see ¶ 958 and DAMAGES
27 *infra*.

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THIRTY-FIFTH CAUSE OF ACTION

COPYRIGHT PIRACY asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 against Defendants MILLER and DOE Defendants 1-300 Inclusive.

(The ACTS; CIVIL RICO; IN TITLE 39 statutory and/or common law)

907. By this reference, Plaintiffs herein incorporates each and every allegation of the foregoing paragraphs 1-906 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS

908. KING and MILLER pirated TBCS/PAEGELS videotapes.

909. CORNELL pirated LEWIS' S photographs.

910. For damages as a result of this and all Criminal Schemes, see ¶ 958 and DAMAGES
infra.

THIRTY-SIXTH CAUSE OF ACTION

FAILURE TO PROPERLY SUPERVISE/SUBORNATION OF ILLEGAL ACTS asserted by ALL Plaintiffs DOE Plaintiffs 1-300 asserted against KRATTI, BASLE, GOLDEN, WESLEY, EDMON, BORRIS, SLOUGH, INS FIN INST, WILEMAN, KELETI, GRAMMER, ALMEIDA, STAROPOLY, JACKSON, FLEMING, VARONOS, MULLIGAN, MASTER CARD, PLIJM, NEWELL, YAO, MILLER, KING, and DOE Defendants 1-300 inclusive.

(The ACTS; T.C.A. § 39-14-114; T.C.A. § 39-12-201 et seq.; T.C.A. § 39-16-602 et seq.; T.C.A. § 39-24-120; T.C.A. § 39-14-412; T.C.A. § 39-12-103; T.C.A. § 39-15-401 et seq.; T.C.A. § 39-17-309; T.C.A. § 39-17-315; T.C.A. § 39-16-702; T.C.A. § 39-14-103' T.C.A. § 39-14-903)

911. By this reference, Plaintiffs herein incorporates each and every allegation of the foregoing paragraphs 1-910 inclusive of this Complaint as if the same were hereat set forth in full.

CRIMINAL SCHEME "A" PREDICATE ACTS

912. FIN INST failed to properly supervise the activities of their licensees, BEATY, FLEMING, VARONOS, JACKSON, MULLIGAN, GRAMMER, SIMMONS, HAYELAND, and CORNELL and their respective companies.

913. MASTER CARD failed to properly supervise the use STAROPOLY, GRAMMER, VARONOS and FLEMING made of its Payoneer Card.

- 1 914. INS failed to supervise WILEMAN, YAO, KELETTI, and NEWELL.
- 2 915. KRATTI, BASLE, GOLDEN suborned judicial racketeering committed by PLUIM,
3 COLE, HAIGHT, WELCH, and SHERMAN including but not limited to acts of rulings that
4 contravened existing law, perjury, bias, bribery, extortion, discovery, and due process
5 violations.
- 6 916. WESLEY and EDMON failed to properly supervise PLUIM and COLE thereby
7 suborning judicial racketeering.
- 8 917. SLOUGH failed to properly supervise HAIGHT and WELCH thereby suborning
9 judicial racketeering.
- 10 918. BORRIS failed to properly supervise SHERMAN thereby suborning judicial
11 racketeering.
- 12 919. BAC failed to properly mediate.
- 13 920. For damages as a result of this and all Criminal Schemes, see ¶ 958.

14 **CRIMINAL SCHEME "B" PREDICATE ACTS**

- 15 921. INS failed to properly supervise the activities of ALMEIDA, WILEMAN, YAO,
16 NEWELL, and KELETI while defending KING and MILLER.
- 17 922. VIEWPARTNER, TSOFTNET, STAROPOLY, TODHD, and ESTARTV failed to
18 properly supervise the activities of the executive officers of those respective "businesses."
- 19 923. As managing partner, ALMEIDA failed to properly supervise the activities of Veatch
20 Carlson associates, WILEMAN, YAO and KELETI.
- 21 924. ALMEIDA intentionally failed to properly supervise by threatening NELLE in
22 response to her inquiry about WILEMAN.
- 23 925. For damages as a result of this and all Criminal Schemes, see ¶ 958.

24 **CRIMINAL SCHEME "C" PREDICATE ACTS**

- 25 926. INS and ALMEIDA failed to properly supervise the activities of WILEMAN and
26 KELETI, who defamed and harassed LEWIS.
- 27 927. INS failed to properly supervise WILEMAN, who represented the interests of all other
28 defendants—including FIN INST, VARONOS, FLEMING, GRAMMER, STERNBERG,

1 CORNELL, JUNCO, TORO and their respective "businesses"—at hearings and did so even
2 after PLUIM had dismissed the complaint against KING, who was supposed to have been his
3 only client according to INS and WILEMAN. WILEMAN'S actions are imputed to all other
4 Defendants.

5 928. For damages as a result of this and all Criminal Schemes, see ¶ 958.

6 **THIRTY-SEVENTH CAUSE OF ACTION**

7 **FAILURE TO SELF-REPORT** asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE
8 Plaintiffs 1-300 asserted against FIN INST and DOE Defendants 1-300 inclusive.

9 (The ACTS; RICO; Federal Deposit Insurance Corporation, the Federal Reserve Board, or the
10 Office of the Comptroller of the Currency.)

11 929. By this reference, Plaintiffs herein incorporates each and every allegation of the
12 foregoing paragraphs 1-928 inclusive of this Complaint as if the same were hereat set forth in
13 full.

14 930. FIN INST failed to report the complaints made against them in GC047909 to bank
15 regulators and the Securities and Exchange Commission.

16 931. PLUIM, SHERMAN, COLE, HAIGHT and WELCH failed to report the income
17 derived through racketeering activities.

18 932. For damages as a result of this and all Criminal Schemes, see ¶ 958.

19 **THIRTY-EIGHTH CAUSE OF ACTION**

20 **ASSAULT** asserted by Plaintiffs LEWIS, TBCS, PAEGELS, and DOE Plaintiffs 1-300 asserted
21 against MILLER, VARONOS and DOE Defendants 1-300 inclusive.

22 (The ACTS; RICO; T.C.A. § 39-13-101)

23 933. By this reference, Plaintiffs herein incorporates each and every allegation of the
24 foregoing paragraphs 1-932 inclusive of this Complaint as if the same were hereat set forth in
25 full.

26 **CRIMINAL SCHEME "A" PREDICATE ACTS**

27 934. Without her permission, MILLER assaulted NELLE at her office, in front of
28 witnesses, by suddenly and uninvitingly springing toward her and applying pressure to her

1 spine.

2 935. WESTBROOK assaulted LEWIS, SCOTT and LEWIS'S mother with the specific
3 intent of causing them physical injury and harassment in collusion with CORNELL, COX and
4 KEHOE.

5 936. For damages as a result of this and all Criminal Schemes, see ¶ 958.

6 **CRIMINAL SCHEME "B" PREDICATE ACTS**

7 937. VARONOS assaulted LEWIS by stating that LEWIS was a "dead man" at a court
8 hearing in case no. GC 047909.

9 938. MILLER chased TBCS/PAEGEL'S process server up the street waiving a pistol at
10 him.

11 939. For damages as a result of this and all Criminal Schemes, see ¶ 958.

12 **CRIMINAL SCHEME "C" PREDICATE ACTS**

13 940. VARONOS assaulted LEWIS by stating, "LEWIS is a DEAD MAN" at a
14 hearing in case no. GC047909.

15 941. For damages as a result of this and all Criminal Schemes, see ¶ 958.

16 **THIRTY-NINTH CAUSE OF ACTION**

17 FALSE IMPRISONMENT/ARREST asserted by LEWIS and DOE Plaintiffs 1-300 against
18 CARMAX and FARGO and DOE Defendants 1-300 inclusive.

19 (The ACTS; RICO; T.C.A. § 39-13-302; T.C.A. § 39-13-304)

20 942. By this reference, Plaintiffs incorporates each and every allegation allegation of the
21 foregoing paragraphs 1-941 inclusive of this Complaint as if the same were hereat set forth in
22 full.

23 **CRIMINAL SCHEME "C" PREDICATE ACTS**

24 943. CARMAX falsely claimed to authorities that LEWIS had "stolen" the vehicle that
25 FARGO repossessed as members of the Criminal Scheme. EXHIBIT 95.

26 944. Prior to this, FARGO gave LEWIS a clear title on his automobile after it was paid off
27 in full in March, 2013. EXHIBIT 95-C.

28 945. CARMAX was given a clear title by LEWIS when he traded his car. It was FARGO

1 that came onto the CARMAX lot and taken the vehicle, not LEWIS.

2 946. FARGO and CARMAX conspired to report to law enforcement that LEWIS had
3 "stolen" a vehicle that he had traded in at CARMAX. CARMAX accused LEWIS of "theft" in
4 order to get the Knoxville Sheriff to arrest LEWIS.

5 947. The truth was that LEWIS he had already paid off said vehicle and had already
6 received a clear title on it and a *refund from FARGO for over-payment*.

7 948. It was FARGO who actually stole the car from CARMAX and blamed LEWIS for it.

8 949. The true purpose of this *fiasco* was to get a mug shot of LEWIS available to distribute
9 on the internet, which SCHWARTZ distributed to NELLE and who knows who else—for a
10 reason he refused to explain, but since PLUIM, WILEMAN, KELETI, CORNELL and
11 MILLER were unsuccessful in finding an actual photo of LEWIS suitable to devise a mug shot
12 from when they conspired to get LEWIS arrested, this occurrence solved that problem.
13 Certainly, all will become clear after this suit is filed.

14 950. Within a few weeks, SCHWARTZ e-mailed NELLE the link of LEWIS'S arrest from
15 a PAID sight, not one normally used by law enforcement; although said site had inaccurate
16 information about LEWIS'S arrest the members of the Criminal Scheme accomplished their
17 goal of effectuating an arrest of LEWIS.

18 951. For damages as a result of this Criminal Scheme, see ¶ 958.

19 **FORTIETH CAUSE OF ACTION**

20 **PREDATORY LENDING/USURY asserted by LEWIS and PAEGELS and DOE Plaintiffs 1-**
21 **300 against CARMAX and DOE Defendants 1-300 inclusive.**

22 (The ACTS; RICO; Consumer Credit Protection Act (CCPA) and anti-usury laws)

23 952. By this reference, Plaintiffs incorporates each and every allegation allegation of the
24 foregoing paragraphs 1-951 inclusive of this Complaint as if the same were hereat set forth in
25 full.

26 **CRIMINAL SCHEME "A" PREDICATE ACTS**

27 953. CARMAX regularly over-charged interest on PAEGEL'S car loan.

28 954. CARMAX charged interest upon interest in making their loan calculations.

1 955. The "grace period" given for payments to be maid resulted in double interest being
2 charged.

3 956. CARMAX'S methods of finance charges constitutes racketeering as a member of a
4 Criminal Scheme that also includes FARGO.

5 957. For damages as a result of this Criminal Scheme, see ¶ 958.

DATED: SUBMITTED BY:

RICHARD LEWIS, *in propria persona* and *ex rel* as a Private Attorney General for Plaintiffs RICHARD LEWIS, RICHARD LEWIS III; LORRAINE LEWIS, SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W. PAEGEL; NELLE S. PAEGEL; THOMAS W.V. PAEGEL; THE BODY COMPANY SPORTS, INC.

A large, stylized watermark reading "COPYRIGHT" in a cursive font, composed of numerous small dots.

958. DAMAGES

Based upon JOINT AND SEVERAL LIABILITY, the foregoing paragraphs 1-957 inclusive, LEWIS and ALL OTHER PLAINTIFFS pray for the following compensatory and punitive damages to be awarded:

- 1) Damages for and/or resulting from OBSTRUCTION OF JUSTICE are as follows:

A. \$100,000,000.00 + \$3,000,000.00 + \$250,000.00 + = \$103,250,000.00 for LEWIS for obstruction of justice, violations of due process, and intimidation by court personnel.

TOTAL= \$103,250,000.00 x TREBLE = 309,750,000.00 for obstruction of justice,

B. ALL DEFENDANTS NAMED IN GCO47909 and all Supplements and Amendments:

1. \$100,000,000.00 + \$3,000,000.00 + \$250,000.00 + = \$103,250,000.00 for PAEGELS/TBCS for violations of due process, conspiracy, defamation, intimidation, collusion, attorney fees, costs, theft, and other charges such further damages as deemed appropriate by the Court and jury.

TOTAL DAMAGES= \$103,250,000.00 x TREBLE = \$309,750,000.00

2. \$100,000,000.00 for LEWIS'S and attempted murder, intimidation, due process, identity theft, defamation, RICO claims and travel.

TOTAL DAMAGES x TREBLE = \$300,000,000.00.

3. \$50,000.00 for damages to LEWIS III's employment, reputation and moving costs.

TOTAL DAMAGES x TREBLE = \$150,000.00.

4. \$50,000.00 for damages to LORRAINE employment, reputation and moving costs.

TOTAL DAMAGES x TREBLE = \$150,000.00.

5. \$1,000,000.00 for damages to LORRAINE due to loss of consortium with Minors 1 and 2.

TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00.

1 6. \$500,000,000.00 for damages to MINOR 1 for having her identity and
2 residence broadcast widely on the internet and for lifelong exposure to
3 predators.

4 TOTAL DAMAGES: \$500,000,000.00 x TREBLE=\$1,500,000,000.00.

5 7. \$1,500,000,000.00 for damages to MINOR 2 for having her identity and
6 residence broadcast widely on the internet and for lifelong exposure to
7 predators and owing to her special needs.

8 TOTAL DAMAGES: \$1,500,000,000.00 x TREBLE=\$4,500,000,000.00.

9 8. \$500,000,000.00 for damages to MINOR 3 for having her identity and
10 residence broadcast widely on the internet and for lifelong exposure to
11 predators.

12 TOTAL DAMAGES: \$500,000,000.00 x TREBLE=\$1,500,000,000.00.

13 9. \$500,000,000.00 for damages to MINOR 4 for having her identity and
14 residence broadcast widely on the internet and for lifelong exposure to
15 predators.

16 TOTAL DAMAGES: \$500,000,000.00 x TREBLE=\$1,500,000,000.00.

17 10. \$5,000,000.00 for damages to SCOTT for collusion to defame, harass,
18 harm, invade privacy and any other harm caused by Defendants.

19 TOTAL DAMAGES: \$5,000,000.00 x TREBLE= \$15,000,000.00.

20 C. \$250,000.00 for attorney fees and costs damages to NELLE during
21 PROPS0700007.

22 TOTAL DAMAGES: \$250,000.00 x TREBLE=\$750,000.00.

23 D. \$251,600.00 as justified in NELLE'S motion for sanctions, fees and costs during
24 cases 30-2012-00609008-PR-TR-CJC and 30-2012-00609235-PR-TR-CJC for
25 mail tampering and mailbox tampering.

26 TOTAL DAMAGES: \$251,600.00 x TREBLE = \$754,800.00

1 And for such further relief as the Court and/or jury may grant for said
2 Defendant's subornation of federal crimes, subornation of discovery violations,
3 collusion, due process, and perjury.

4 E. \$4,200 in sanctions against NELLE in cases 30-2012-00609008-PR-TR-CJC and
5 30-2012-00609235-PR-TR-CJC.

6 TOTAL DAMAGES: \$4,200.00 x TREBLE = \$12,800.00.

7 F. \$8,250 in sanctions against NELLE in case GC047909.

8 TOTAL DAMAGES: \$8,250.00 x TREBLE = \$24,750.00.

9 G. \$50,000.00 for each instance of judicial racketeering.

10 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

11 H. \$50,000.00 for each instance of judicial bias.

12 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

13 I. \$50,000.00 for each instance of collusion derived by or to a court or court
14 personnel.

15 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

16 J. \$50,000.00 for each instance of attempted murder by or to a court or court
17 personnel.

18 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

19 K. \$50,000.00 for each instance of violations of procedural and/or substantive due
20 process by a court or court personnel, county counsel, or presiding judge.

21 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

22 L. \$50,000.00 for each instance of conspiracy by or to a court, court personnel,
23 county counsel, or presiding judge.

24 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

25 M. \$50,000.00 for each instance of perjury by or to a court, court personnel,
26 county counsel, or presiding judge.

27 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

1 N. \$50,000.00 for each instance of defamation by or to a court, court personnel,
2 county counsel, or presiding judge.

3 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

4 O. \$50,000.00 for each instance of bribery by or to a court, court personnel,
5 county counsel, or presiding judge.

6 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

7 P. \$50,000.00 for each instance of false reporting by or to a court, court personnel,
8 county counsel, or presiding judge.

9 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

10 Q. \$50,000.00 for each instance of tax fraud by or to a court, court personnel,
11 county counsel, or presiding judge.

12 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

13 R. \$50,000.00 for each instance of assault by or in a court of law.

14 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

15 S. \$50,000.00 for each instance of elder abuse by or to a court, court personnel,
16 county counsel, or presiding judge.

17 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

18 T. \$50,000.00 for each instance of extrinsic fraud by or to a court, court personnel,
19 county counsel, or presiding judge.

20 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

21 U. \$50,000.00 for each instance of any other, as yet unidentified, illegal act
22 committed by or to a court, court personnel, county counsel, or presiding judge.

23 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

24 V. \$103,000,000.00 for FAILING TO ADJUDICATE NELLE'S petitions and
25 motions in case GC047909.

26 TOTAL DAMAGES: \$103,000,000.00 x TREBLE = \$309,000,000.00

27 W. \$100,000,000.00 for FAILING TO ADJUDICATE LEWIS'S petitions and
28 motions in case GC047909.

- 1 **TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00**
- 2 X. \$500,000.00 for FAILING TO ADJUDICATE NELLE'S petitions and motions in
3 case PROPS0700007.
- 4 **TOTAL DAMAGES: \$500,000.00 x TREBLE = \$1,500,000.00.**
- 5 Y. \$250,000 for FAILING TO ADJUDICATE NELLE'S motion in case nos.
6 30-2012-00609008-PR-TR-CJC and 30-2012-00609235-PR-TR-CJC.
- 7 **TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00**
- 8 Z. \$50,000,000.00 for FAILING TO ADJUDICATE LEWIS'S motions in case
9 SS022572.
- 10 AA. \$50,000.00 for each instance of TECHNOLOGY HACKING by any Defendant.
- 11 **TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances**
- 12 AB. \$50,000.00 for each instance of WIRE TAPPING by any Defendant.
- 13 **TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.**
- 14 AC. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 15 2) Damages for and/or resulting from GRAND THEFT BY FALSE PRETENSES are as
16 follows:
- 17 A. \$100,000,000.00 as the loss of GC047909 incurred through criminal acts of
18 Defendants.
- 19 **TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.**
- 20 B. \$3,000,000.00 as the cost of litigation of GC047909.
- 21 **TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00.**
- 22 C. \$250,000.00 Restitution damages of GC047909.
- 23 **TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.**
- 24 D. \$25,000 damages for money and property stolen from LEWIS.
- 25 **TOTAL DAMAGES: \$25,000.00 x TREBLE = \$75,000.00.**
- 26 E. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 27
- 28

- 1 3) Damages for and/or resulting from CONSPIRACY are as follows:
- 2 A. \$50,000 for each instance of conspiracy excluded by "1)L" above.
- 3 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 4 B. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 5 4) Damages for and/or resulting from EXTORTION are as follows:
- 6 A. \$50,000 for each instance of extortion.
- 7 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 8 B. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 9 5) Damages for and/or resulting from CREDIT CARD FRAUD are as follows:
- 10 A. \$1849.00 for damages derived as the result of fraud to LEWIS'S credit card.
- 11 TOTAL DAMAGES: \$1849.00 x TREBLE = \$5,547.00.
- 12 B. \$50,000.00 for each instance of credit card fraud.
- 13 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 14 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 15 6) Damages for and/or resulting from CHILD ENDANGERMENT AND ABUSE are as
- 16 follows:
- 17 A. \$50,000 for life disruption, moving, relocation, loss of employment to
- 18 LORRAINE LEWIS as a result of MINOR'S identities and residence placed on
- 19 the internet.
- 20 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00.
- 21 B. \$1,000,000.00 for MINOR 1's loss of consortium and affection with LORRAINE.
- 22 TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00.
- 23 C. \$3,000,000.00 for MINOR 2's loss of consortium and affection with LORRAINE
- 24 and extreme emotional distress due to her special needs.
- 25 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00.
- 26 D. \$50,000 for life disruption, moving, relocation, loss of employment to RICHARD
- 27 LEWIS III as a result of MINOR'S identities and residence placed on the
- 28 internet.

1 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00.

2 E. \$50,000.00 for each instance of child endangerment.

3 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

4 F. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

5 7) Damages for and/or resulting from UNFAIR/DECEPTIVE ACTS OR PRACTICES IN
6 COMMERCE are as follows:

7 A. \$250,000.00 restitution damages for GC047909.

8 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.

9 B. \$1,000.00 restitution damages for rent paid to CORNELL during litigation of
10 GC047909.

11 TOTAL DAMAGES: \$1,000.00 x TREBLE = \$3,000.00.

12 C. \$50,000.00 for each instance of deception in commerce.

13 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

14 D. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

15 8) Damages for and/or resulting from FRAUD BY INTENTIONAL
16 MISREPRESENTATION are as follows:

17 A. \$103,000,000.00 for losses of PAEGELS/TBCS associated with GC047909.

18 TOTAL DAMAGES: \$103,000,000.00 x TREBLE = \$309,000,000.00.

19 B. \$250,000.00 restitution damages for PAEGELS/TBCS associated with GC047909.

20 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.

21 C. \$1,000.00 restitution damages for rent paid to CORNELL during litigation of
22 GC047909.

23 TOTAL DAMAGES: \$1,000.00 x TREBLE = \$3,000.00.

24 D. \$50,000.00 for each instance of fraud by intentional misrepresentation.

25 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

26 E.. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

27 9) Damages for and/or resulting from FRAUD BY NEGLIGENCE are as follows:

28 A. \$103,000,000.00 for losses of PAEGELS/TBCS associated with GC047909.

- 1 TOTAL DAMAGES: \$103,000,000.00 x TREBLE = \$309,000,000.00.
- 2 B. \$250,000.00 restitution damages for PAEGELS/TBCS associated with GC047909.
- 3 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.
- 4 C. \$1,000.00 restitution damages for rent paid to CORNELL during litigation of
- 5 GC047909.
- 6 TOTAL DAMAGES: \$1,000.00 x TREBLE = \$3,000.00.
- 7 D. \$50,000.00 for each instance of fraud by negligence.
- 8 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 9 E. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 10) Damages for and/or resulting from FRAUD BY FRAUDULENT INDUCEMENT are as follows:
- 11 A. \$3,000,000.00 for NELLE'S attorney fees and costs of litigating GC047909.
- 12 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00.
- 13 B. \$250,000.00 for TBCS/PAEGEL'S restitution in GC047909.
- 14 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.
- 15 C. \$12,600 for LEWIS'S restitution during GC047909.
- 16 TOTAL DAMAGES: \$12,600.00 x TREBLE = \$37,800.00.
- 17 D. \$100,000,000.00 for inducing LORRAINE to sign child custody papers that were
- 18 misrepresented to her.
- 19 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.
- 20 E. \$10,000,000.00 for inducing LORRAINE into believing that mediation was
- 21 unbiased.
- 22 TOTAL DAMAGES: \$10,000,000.00 x TREBLE = \$30,000,000.00.
- 23 F. \$103,000,000.00 for defending KING and MILLER in GC047909.
- 24 TOTAL DAMAGES: \$103,000,000.00 x TREBLE = \$309,000,000.00.
- 25 G. \$50,000.00 for each instance of fraud by fraudulent inducement.
- 26 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 27 H. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

- 1
2 11) Damages for and/or resulting from INDUCEMENT TO COMMIT FRAUD are as
3 follows:
- 4 A. \$100,000,000.00 for inducement of PAEGELS/TBCS to commit fraud on 3rd
5 parties in association with GC047909.
6 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$3,000,000.00.
- 7 B. \$700.00 per month damages for stealing MINOR 2's SSI award for her disability.
8 TOTAL DAMAGES: \$700.00/mo. x TREBLE = \$2,100.00/mo.
- 9 C. \$50,000.00 for each instance of inducement to commit fraud.
10 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 11 D. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 12 12) Damages for and/or resulting from CONVERSION are as follows:
- 13 A. \$250,000.00 for restitution in GC047909.
14 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.
- 15 B. \$12,600 for restitution during GC047909.
16 TOTAL DAMAGES: \$12,600.00 x TREBLE = \$37,800.00.
- 17 C. \$2,000,000.00 for conversion of KING'S claim against INS. owed to PAEGELS/
18 TBCS in GC047909.
19 TOTAL DAMAGES: \$2,000,000.00 x TREBLE= \$6,000,000.00
- 20 D. \$2,000,000.00 per incident for interference and disruption of GC047909.
21 TOTAL DAMAGES: \$2,000,000.00 x TREBLE x \$6,000,000.00 x No. of
22 Incidents
- 23 E. \$1,100,000.00 for the conversion of money and property of an estate by
24 HAYELAND and CORNELL.
25 TOTAL DAMAGES: \$1,100,000.00 x TREBLE = \$3,300,000.00
- 26 F. \$1849.00 for damages derived as the result of conversion of LEWIS'S credit card.
27 TOTAL DAMAGES: \$1849.00 x TREBLE = \$5,547.00.
- 28 G. \$3,000,000.00 for attorney fees and costs associated in conversion of GC047909.

1 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00.

2 H. \$50,000.00 for each instance of conversion.

3 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

4 I. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

5 13) Damages for and/or resulting from GRAND LARCENY/THEFT OF PERSONAL
6 PROPERTY are as follows:

7 A. \$92,000 for theft of LEWIS'S money and property.

8 TOTAL DAMAGES: \$92,000 x TREBLE = \$276,000.00.

9 B. \$100,000,000.00 for theft of material recorded on TBCS/PAEGEL'S videotapes.

10 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.

11 C. \$251,025.00 for theft of PAEGELS/TBCS money and property.

12 TOTAL DAMAGES: \$251,025.00 x TREBLE = \$753,075.00.

13 D. \$1,000,000.00 for theft of LEWIS'S Purple Heart Set.

14 TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00.

15 E. \$10,000.00 for theft of LEWIS'S photos from his internet site.

16 TOTAL DAMAGES: \$10,000.00 x TREBLE = \$30,000.00.

17 F. \$2,000,000.00 theft of KING'S insurance claim FBO PAEGELS/TBCS in
18 GC047909.

19 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.

20 G. \$2,000,000.00 theft of LEWIS'S identity as a result of avoiding the payment of
21 KING'S insurance claim in GC047909.

22 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.

23 H. \$2,000,000.00 theft of LEWIS III'S identity as a result of avoiding the
24 payment of KING'S insurance claim in GC047909.

25 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.

26 I. \$2,000,000.00 theft of LORRAINE'S identity as a result of avoiding the
27 payment of KING'S insurance claim in GC047909.

28 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.

- 1 J. \$2,000,000.00 theft of MINOR 1's identity as a result of avoiding the
2 payment of KING'S insurance claim in GC047909.
3 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 4 K. \$2,000,000.00 theft of MINOR 2's identity as a result of avoiding the
5 payment of KING'S insurance claim in GC047909.
6 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 7 L. \$2,000,000.00 theft of MINOR 3's identity as a result of avoiding the
8 payment of KING'S insurance claim in GC047909.
9 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 10 M. \$2,000,000.00 theft of MINOR 4's identity as a result of avoiding the
11 payment of KING'S insurance claim in GC047909.
12 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 13 N. \$2,000,000.00 theft of NELLE's identity as a result of avoiding the
14 payment of KING'S insurance claim in GC047909.
15 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 16 O. \$2,000,000.00 theft of SCOTT's identity as a result of avoiding the
17 payment of KING'S insurance claim in GC047909.
18 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.
- 19 P. \$700.00/mo. of MINOR 2's SSI payments.
20 TOTAL DAMAGES: \$700.00 x TREBLE = \$2100.00/mo.
- 21 Q. \$50,000.00 for each instance of conversion.
22 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 23 R. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 24 14) Damages for and/or resulting from GRAND THEFT OF MATERIAL are as follows:
25 A. \$89,400 for theft of LEWIS'S money and property.
26 TOTAL DAMAGES: \$89,400 x TREBLE = \$268,200.00.
- 27 B. \$100,000,000.00 for theft of material recorded on TBCS/PAEGEL'S videotapes.
28 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.

- 1 C. \$251,025.00 for theft of PAEGELS/TBCS videotapes.
2 TOTAL DAMAGES: \$251,025.00 x TREBLE = \$753,075.00.
3 D. \$1,000,000.00 for theft of LEWIS'S Purple Heart Set.
4 TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00.
5 E. \$10,000.00 for theft of LEWIS'S photos from his internet site.
6 TOTAL DAMAGES: \$10,000.00 x TREBLE = \$30,000.00.
7 F. \$2,000,000.00 theft of KING'S insurance claim FBO PAEGELS/TBCS in
8 GC047909.
9 G. \$700.00/mo. of MINOR 2's SSI payments.
10 TOTAL DAMAGES: \$700.00 x TREBLE = \$2,100.00/mo.
11 H. \$50,000.00 for each instance of grand theft of material.
12 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
13 I. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
14 15) Damages for and/or resulting from UNFAIR COMPETITION BY TORTIOUS
15 INTERFERENCE are as follows:
16 A. \$3,000,000,000.00 (3 bil.) for reasonable losses caused by Defendant's interfering
17 with PAEGELS/TBCS prior business relationships.
18 TOTAL DAMAGES: \$3 bil. x TREBLE = \$9 bil.
19 B. \$500,000.00 for interference with NELLE'S children's book.
20 TOTAL DAMAGES: \$500,000.00 x TREBLE = \$1,500,000.00.
21 C. \$1,200,000.00 for interference with LEWIS'S research firm.
22 TOTAL DAMAGES: \$1,200,000.00 x TREBLE = \$3,600,000.00.
23 D. \$50,000.00 for interference with LORRANE'S employment.
24 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00.
25 E. \$50,000.00 for interference with LEWIS III'S employment.
26 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00.
27 F. \$50,000.00 for each instance of unfair competition.
28 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

1 G. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

2 (16) Damages for and/or resulting from the UNAUTHORIZED PRACTICE OF LAW are as
3 follows:

4 A. \$100,000,000.00 for the intentional mishandling and/or misleading Plaintiffs'
5 regarding their requests for default in case GC047909.

6 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.

7 B. \$5,000.00 for payments for unauthorized legal work.

8 TOTAL DAMAGES: \$5,000.00 x TREBLE = \$15,000.00.

9 C. \$100,000,000.00 for intentional corruption of Complaint filed in GC047909.

10 TOTAL DAMAGES: \$100,000,000.00 x TREBLE = \$300,000,000.00.

11 D. \$8,500 for sanctions against NELLE in GC047909.

12 TOTAL DAMAGES: \$8,500.00 x TREBLE = \$25,500.00

13 E. \$4,200 for sanctions against NELLE in cases 30-2012-00609008-PR-TR-CJC and
14 30-2012-00609235-PR-TR-CJC.

15 TOTAL DAMAGES: \$4,200.00 x TREBLE = \$12,600.00

16 F. \$250,000.00 for attorney fees and costs associated with PROPS0700007.

17 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00

18 G. \$1,600.00 for attorney fees and costs associated with BC495150.

19 TOTAL DAMAGES: \$1,600.00 x TREBLE = \$4,800.00

20 H. \$500.00 for fees and costs associated with SS022572.

21 TOTAL DAMAGES: \$500.00 x TREBLE = \$1,500.00

22 I. \$1,000,000.00 for deceptive legal practices that harmed LORRAINE in case
23 12001807ca.

24 TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00

25 J. \$3,000,000.00 for deceptive legal practices that harmed MINOR 2 in case
26 12001807ca.

27 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00

1 K. \$1,000,000.00 for deceptive legal practices that harmed MINOR 1 in case
2 12001807ca.

3 TOTAL DAMAGES: \$1,000,000.00 x TREBLE = \$3,000,000.00

4 L. \$50,000.00 for each instance of practicing law without a license.

5 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

6 M. \$2,000,000.00 for each instance of recklessly endangering LEWIS'S life.

7 TOTAL DAMAGES: \$2,000,000.00 x TREBLE = \$6,000,000.00.

8 N. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

9 17) Damages for and/or resulting from BREACH OF CONTRACT are as follows:

10 A. \$250,000.00 for restitution related to monies paid by TBCS/PAEGELS.

11 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00.

12 B. \$3,000,000.00 for attorney fees and costs of suit for GC047909.

13 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00.

14 C. 3,000,000,000.00 (3 bil.) for lost future profits from sales of videotaped material.

15 TOTAL DAMAGES: \$3 bil x TREBLE = \$9 bil.

16 D. 5,000,000,000.00 (3 bil.) for lost future profits from sales generated from exercise
17 assets.

18 TOTAL DAMAGES: \$5bil x TREBLE = \$15 bil.

19 E. \$2769.00 for restitution related to monies paid by LEWIS.

20 TOTAL DAMAGES: \$2769.00 x TREBLE = \$8307.00.

21 F. \$10,000.00 for restitution related to costs of suit paid by LEWIS.

22 TOTAL DAMAGES: \$10,000.00 x TREBLE = \$30,000.00.

23 G. Such further treble damages for breaches of contracts as yet unidentified.

24 H. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

25 18) Damages for and/or resulting from BREACH OF COVENANT OF GOOD FAITH
26 AND FAIR DEALING are as follows:

27 A. \$50,000.00 for each instance of breach of this covenant by any Defendant.

28 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

- 1 B. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 2 19) Damages for and/or resulting from INTENTIONAL INTERFERENCE are as follows:
- 3 A. \$5 bil. for lost potential profits from exercise programs business.
- 4 TOTAL DAMAGES: \$5 bil. x TREBLE = \$15 bil.
- 5 B. Such further treble damages for breaches of contracts as yet unidentified.
- 6 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 7 20) Damages for and/or resulting from FRAUD AND ABUSE are as follows:
- 8 A. \$250,000.00 for defrauding TBCS/PAEGELS.
- 9 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00
- 10 B. \$3,000,000.00 for defrauding NELLE regarding attorney fees and costs , case
11 GCe47909.
- 12 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00
- 13 C. \$250,000.00 attorney fees of NELLE in PROPS0700007.
- 14 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00
- 15 D. \$5,000,000.00 for each instance of loss of NELLE'S reputation by any Defendant.
- 16 TOTAL DAMAGES: \$5,000,000.00 x TREBLE = \$15,000,000.00 x No. of
17 Instances
- 18 E. \$50,000.00 for each instance of abuse of any Plaintiff caused by any Defendant.
- 19 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 20 F. \$700.00 per month for defrauding MINOR 2.
- 21 TOTAL DAMAGES: \$700.00 x TREBLE x No. of Months
- 22 G. \$12,769.00 for defrauding LEWIS.
- 23 TOTAL DAMAGES: \$12,769.00 x TREBLE = \$38,307.00.
- 24 H. Such further treble damages for fraud and/or abuse as yet unidentified.
- 25 I. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 26 21) Damages for and/or resulting from INTERNET PIRACY are as follows:
- 27 A. \$50,000.00 for each instance of internet piracy.
- 28 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances

- 1 B. Such further treble damages for internet piracy as yet unidentified.
- 2 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 3 22) Damages for and/or resulting from NEGLIGENCE/GROSS NEGLIGENCE are as
- 4 follows:
- 5 A. \$10 bil. for negligence/gross negligence as compensation for losses and harm to
- 6 any Plaintiffs.
- 7 TOTAL DAMAGES: \$10 bil. x TREBLE = \$30 bil.
- 8 B. Such further treble damages for negligence/gross negligence as yet unidentified.
- 9 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 10 23) Damages for and/or resulting from GRAND THEFT BY EMBEZZLEMENT are as
- 11 follows:
- 12 A. \$250,000.00 for embezzling from TBCS/PARGELS.
- 13 TOTAL DAMAGES: \$250,000.00 x TREBLE = \$750,000.00
- 14 B. \$3,000,000.00 for embezzling NELLE'S attorney services during case GCo47909.
- 15 TOTAL DAMAGES: \$3,000,000.00 x TREBLE = \$9,000,000.00
- 16 C. \$50,000.00 for each additional instance of embezzlement of any Plaintiff caused
- 17 by any Defendant, directly or indirectly.
- 18 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances
- 19 D. Such further treble damages for embezzlement as yet unidentified.
- 20 E. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 21 24) Damages for and/or resulting from FALSE LIGHT INVASION OF PRIVACY are as
- 22 follows:
- 23 A. \$50,000.00 per instance of invading the privacy of a Plaintiff.
- 24 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
- 25 B. Such further treble damages for invasion of privacy as yet unidentified.
- 26 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 27 25) Damages for and/or resulting from COMPUTER FRAUD AND ABUSE are as follows:
- 28

- 1 A. \$50,000.00 per instance of BUSINESS INTERFERENCE by any Defendant.
2 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
3 B. Such further treble damages for harassment or IED as yet unidentified.
4 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 5) Damages for and/or resulting from DEFAMATION are as follows:
6 A. \$50,000.00 per instance of DEFAMATION by any Defendant.
7 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
8 B. Such further treble damages for defamation as yet unidentified.
9 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 10) Damages for and/or resulting from VIOLATIONS OF DISCOVERY are as follows:
11 A. \$50,000.00 per instance of a single violation of the rules of discovery by any
12 Defendant.
13 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
14 B. Such further treble damages for violations of discovery as yet unidentified.
15 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 16) Damages for and/or resulting from INCOME TAX FRAUD AND EVASION are as
17 follows:
18 A. Actual taxes owed by any Defendant for each instance of tax fraud or evasion.
19 TOTAL DAMAGES: \$TBD x TREBLE x No. of Instances.
20 B. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 21) Damages for and/or resulting from MONEYLAUNDERING.
22 A. \$50,000.00 per instance of moneylaundering by any Defendant.
23 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
24 B. Such further treble damages for moneylaundering as yet unidentified.
25 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 26) Damages for and/or resulting from COPYRIGHT INFRINGEMENT are as follows:
27 A. \$50,000.00 per instance of copyright infringement by any Defendant.
28 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.

- 1 B. Such further treble damages for copyright infringement as yet unidentified.
- 2 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 35) Damages for and/or resulting from COPYRIGHT PIRACY are as follows:
- 4 A. \$50,000.00 per instance of copyright piracy by any Defendant.
- 5 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
- 6 B. Such further treble damages for copyright piracy as yet unidentified.
- 7 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 36) Damages for and/or resulting from FAILURE TO PROPERLY SUPERVISE are as follows:
- 10 A. \$1 bil. for failure to properly supervise Defendants that resulted in harm to Plaintiffs and/or the public.
- 12 TOTAL DAMAGES: \$1 bil. x TREBLE = \$3 bil.
- 13 B. Such further treble damages for failure to supervise as yet unidentified.
- 14 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 37) Damages for and/or resulting from FAILURE TO SELF-REPORT are as follows:
- 16 A. \$1 bil. for failure to properly supervise Defendants that resulted in harm to Plaintiffs and/or the public.
- 18 TOTAL DAMAGES: \$1 bil. x TREBLE = \$3 bil.
- 19 B. Such further treble damages for failure to self-report as yet unidentified.
- 20 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 38) Damages for and/or resulting from ASSAULT are as follows:
- 22 A. \$50,000.00 per instance of copyright piracy by any Defendant.
- 23 TOTAL DAMAGES: \$50,000.00 x TREBLE = \$150,000.00 x No. of Instances.
- 24 B. Such further treble damages for assault as yet unidentified.
- 25 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
- 39) Damages for and/or resulting from FALSE IMPRISONMENT/ARREST are as follows:
- 27 A. \$1 bil. for the false arrest and imprisonment of LEWIS, embarrassment and

1 resulting widespread internet distribution *inter alia* of false mug shot on a paid
2 website.

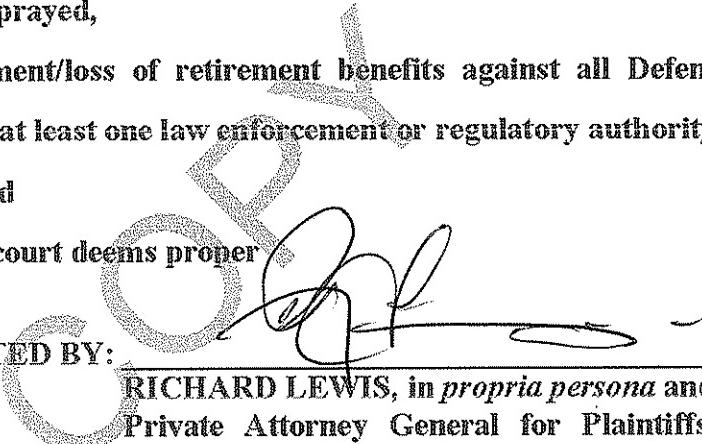
3 **TOTAL DAMAGES: \$1 bil. x TREBLE = \$3 bil.**

- 4 B. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.
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- 40) Damages for and/or resulting from PREDATORY LENDING are as follows:
6 A. \$27,000.00 for predatory lending on PAEGEL'S automobile loan.
7 **TOTAL DAMAGES: \$27,000.00 x TREBLE = \$81,000.00.**
8 B. Such further treble damages for predatory lending as yet unidentified.
9 C. An award of PUNITIVE DAMAGES as determined by the Court and/or Jury.

10 WHEREAS for all the foregoing reasons PLAINTIFFS pray for the following;

- 11 1.) All damages claimed as prayed,
12 2.) Sanctions/arrest/disbarment/loss of retirement benefits against all Defendants whose
13 actions are governed by at least one law enforcement or regulatory authority;
14 3.) All charges affirmed, and
15 4.) Such other relief as the court deems proper

16 DATED:

17 SUBMITTED BY: 

18 RICHARD LEWIS, *in propria persona* and *ex rel* as a
19 Private Attorney General for Plaintiffs RICHARD
20 LEWIS, RICHARD LEWIS III; LORRAINE LEWIS,
SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W.
PAEGEL; NELLE S. PAEGEL; THOMAS W.V.
PAEGEL; THE BODY COMPANY SPORTS, INC.

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COMPLAINT

Page 149

REQUEST FOR DECLARATORY RELIEF

Constructive Trust

"A constructive trust is an involuntary equitable trust created as a remedy to compel the transfer of property from the person wrongfully holding it to the rightful owner." *In re Real Estate Associates Ltd. Partnership Litig.*, 223 F. Supp. 2d 1109, 1139 (C.D. Cal. 2002).

“The imposition of a constructive trust requires: (1) the existence of res (property or some interest in property); (2) the right of the complaining party to that res; and (3) some wrongful acquisition or detention of the res by another party who is not entitled to it.” See *Burlesci v. Petersen*, 68 Cal. App. 4th 1062, 1069 (1998).

PAEGELS/TBCS claim that a constructive trust must be imposed against those Defendants who are in possession of their property. Last seen, MILLER, KING and NIVEN were in actual possession of some 41 or so videotapes belonging solely and unquestionably to said Plaintiffs that said Defendants refused to voluntarily return. The Court is urged to immediately order their return in original condition. The videotapes include the EVENT, Frank and Sons interviews, NELLE'S interviews, NIVEN training interviews, Extreme Green videos and any others also described in detail *supra*.

CORNELL or any Defendant in possession thereof, must return LEWIS'S Purple Heart Set, two cell phones, identification and veterans administration cards (2), and his gold gentlemen's bracelet.

Furthermore, any Defendant or his/her associate who has used the foregoing material to create derivative material(s) must now divest any and all of those materials as well.

Preliminary Injunction

Preliminary injunction is appropriate where the party seeking a preliminary injunction must show a substantial likelihood of success on the merits of the lawsuit and a substantial threat of irreparable harm if the injunction is not granted. Defendants' racketeering included, but was not limited to, the theft of property and identities of the Plaintiffs for a two-pronged purpose: First, to acquire property for their own benefit and second to punish to the *greatest degree possible* the Plaintiffs for demanding that Defendants return their property and "cease and desist" using it. To wit,

1 Defendants have *inter alia* sought to: attract predators to the MINORS, ruin careers by damaging
2 reputations, cause further financial harm Plaintiffs, get LEWIS and NELLE arrested, discredit
3 LEWIS, separate MINORS 1 & 2 from their mother, abuse MINORS, and cause LEWIS so much
4 emotional and physical distress with the goal of his premature death. Defendants "assault" on all of
5 the Plaintiffs has been well-organized and has already resulted in irreparable harm.

6 As described in detail *supra*, ALL Plaintiffs seek a preliminary injunction against any and all
7 Defendants and their associates precluding continued exposure of the identities of MINORS;
8 defamation(s) of any Plaintiff; selling of Plaintiff's material; conducting on-line businesses illegally,
9 conducting in-person businesses illegally; infringing copyrights; infringing domain names;
10 impersonating any Plaintiff, using or deriving a benefit from any derivative(s) acquired through the
11 use of Plaintiff's possession(s) of any kind; and any further attempts to harm or cause the harm to any
12 Plaintiff.

13 Owing to the criminal nature of Defendants actions, Plaintiffs will not only succeed on the
14 merits of their case, but continued criminal activities have already caused irreparable harm and will
15 certainly continue to do so.

16 Respectfully, Plaintiffs request an immediate constructive trust and preliminary
17 injunction be ordered by the Court.

18 DATED: SUBMITTED BY: RICHARD LEWIS, in *propria persona* and *ex rel* as a
19 Private Attorney General for Plaintiffs RICHARD
20 LEWIS, RICHARD LEWIS III; LORRAINE LEWIS,
21 SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W.
22 PAEGEL; NELLE S. PAEGEL; THOMAS W.V.
23 PAEGEL; THE BODY COMPANY SPORTS, INC.

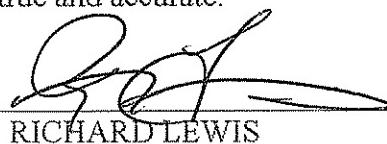
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VERIFICATION OF RICHARD LEWIS

I, Richard LEWIS, III have read the herein complaint and verify under oath that to the best of my knowledge and belief that the allegations are true and accurate.

DATED:

Submitted By:



RICHARD LEWIS

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VERIFICATION OF THOMAS W. PARKER

I, Thomas William Parker, an individual and as Treasurer of The Body Chiropractic Sports, Inc. have read the herein complaint and verify under oath that to the best of my knowledge and belief the allegations are true and accurate.

DATED: 10-19-13

By *Thomas W. Parker*

COMPLAINT

VERIFICATION OF THOMAS W. V. PARCEL

I, Thomas Wolfgang Von Parcel, an individual and as Secretary of The Body Company Sports, Inc., have read the herein complaint and verify under oath that to the best of my knowledge and belief that the allegations are true and accurate.

DATED: 10-14-2013

By: *Thomas W. V. Parcel*

THOMAS W V PARCEL

COMPLAINT

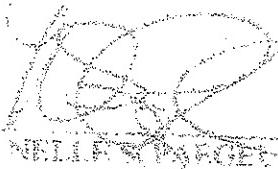
Case 3:13-cv-00675-TAV-CCS Document 1-1 Filed 11/14/13 Page 154 of 163 PageID #: 175

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VERIFICATION FOR WILLIE S. PARROT

I, WILLIE S. Parrot, Esq., an individual and President of The Body Company Sports, Inc.,
hereby verify the herein complaint and verify under oath that to the best of my knowledge and belief that
the allegations are true and accurate.

Dated: Oct 18, 2013 by:



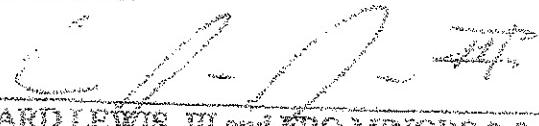
COMPLAINT

VERIFICATION OF RICHARD LEWIS, III

I, Richard Lewis, III have read the herein complaint and verify under oath that to the best of my knowledge and belief that the allegations are true and accurate.

Dated: 9/28/13

Submitted By:


RICHARD LEWIS, III and PRO MINORS 3 & 4

VERIFICATION OF LORRAINE LEWIS

I, Lorraine Lewis have read the herein complaint and verify under oath that to the best of my knowledge and belief that the allegations are true and accurate.

DATED: 11/14/13

Submitted By: Lorraine Lewis

LORRAINE LEWIS and FBO MINORS 1 & 2

Scott
VERIFICATION OF SCOTT E. LEWIS

SCOTT E. LEWIS have read the herein complaint and verify under oath that to the best of my knowledge and belief that the allegations are true and accurate.

DATED: 11/14/13 Submitted By:

Scott E. Lewis
SCOTT E. LEWIS

LIST OF EXHIBITS

1. LEWIS SUPPLEMENT filed August 6, 2012 in case no. GC047909.
 2. Excerpts of Transcripts in case no. GC047909.
 3. Tentative Rulings for certain hearings.
 4. CourtCall cancellations by THOMAS and VARGAS.
 5. Case: *Firestone v. Hoffman* showing WILEMAN admonished by California Appellate Court for lying to the court.
 6. Comparative analysis between original complaint filed in case no. GC047909 and WILEMAN'S corrupted version submitted by him directly to federal court.
 7. TMZ posting by CORNELL admitting to helping "KELSEY'S TEAM."
 8. Fraudulent profile on LEWIS created by WILEMAN to defame and discredit LEWIS.
 9. CORNELL admission to posting private information about MINORS.
 10. IRS letters to LEWIS where his 1040 form had been altered by hacking into the IRS database.
 11. Excerpt of Docket/Case Summary for GC047909.
 12. Notice of No-Bail arrest warrant filed by WILEMAN, that was never issued or served.
 13. Notes from LEWIS'S medical doctors and device cards.
 14. Transcription of "meet and confer" on January 16, 2012.
 15. CORNELL'S accusations against LEWIS; LEWIS'S military I.D. to refute.
 16. Demands and proof of payments by Plaintiffs.
 17. Free Press Release for TODHD Child-A-Thon fundraiser.
 18. CORNELL'S STAROPOLY "pitch" for new Associates and list of CORNELL'S "Recruits."
 19. STAROPOLY advertising materials.
 20. STAROPOLY conference call reminder re: GRAMMER.
 21. HAYELAND LinkedIn biography.
 22. GRAMMER'S TODHD ads and "launch" call invitation.
 23. MILLER/HITMAN "sales pitch" and Agreement with TBCS.

- 1 24. Variety/Williams/VARONOS/TODHD Agreement and Power of Comedy advertising.
- 2 25. MILNER/ROBINSON Agreement with TBCS/PAEGELS and payment.
- 3 26. Excerpts of GREEN/TORO Agreement with VIEWPARTNER/VARONOS &
4 GREEN/TORO Agreement with TBCS and some cancelled checks.
- 5 27. MYEZTV description and abandonment status.
- 6 28. HITMAN/ALLEN S. MILLER advertisement.
- 7 29. VIEWPARTNER proposed Agreement with TBCS drafted by ROBINSON and
8 signed by VARONOS. Invoice and payments.
- 9 30. Excerpt of ESTARHD terms of service and FLEMING promotional.
- 10 31. STAROPOLY ad by VARONOS and FLEMING.
- 11 32. E-mail from MILLER promising to return video tapes; digitizing invoice and
12 payment.
- 13 33. Variety full-page ad to TODHD with CORNELL and GRAMMER featured.
- 14 34. TODHD Channel Guide.
- 15 35. Secretary of state entity searches of STAROPOLY and MERITUS documents. E-mail
16 from BEATY with MERITUS Application.
- 17 36. News article about CORNELL and HAYELAND investigation by L.A.P.D.
- 18 37. MILLER extortion demands and notice of small claims ruling.
- 19 38. PRLog and HITMANPR.COM by MILLER/HITMAN defaming NELLE PAEGEL on
20 the internet.
- 21 39. STAROPOLY credit card report for automatic monthly charges to Associate
22 CORNELL.
- 23 40. Photocopy of STAROPOLY Payoneer card issued by MasterCard.
- 24 41. STAROPOLY Commission statement.
- 25 42. MILLER demand for payment via credit card to Russian National for "artwork."
- 26 43. MILLER/HITMAN PRLog on Cavi-Lipo/KING deception.
- 27 44. Assorted proof of deceptive business practices and KING'S false advertising and fraud
28 on internet and City of San Marino.

- 1 45. LEWIS loans of money to CORNELL.
- 2 46. One of MILLER'S complaints to California State Bar against NELLE PAEGEL.
- 3 47. Excerpt of MILLER'S advertisement brochure for TBCS use.
- 4 48. CORNELL'S Military Godshots Basic Info.
- 5 49. Excerpt of material pirated by MILLER on internet site, One Pakistan, and site of
- 6 MILLER'S sales of PAEGEL'S infringed material.
- 7 50. I.R.S. inquiry of MILLER and TORO.
- 8 51. California State Franchise Tax Board Demand to Furnish Information about
- 9 MILLER.
- 10 52. E-mail from MILLER refusing to give tax I.D. number to NELLE PAEGEL.
- 11 53. Discovery demands during case no. GC047909.
- 12 54. Admission by CORNELL to child endangerment.
- 13 55. HADDOCK/LORRAINE Child Custody and Mediation Documentation re: MINORS 1
- 14 & 2.
- 15 56. GRAMMER/STAROPOLY advertising
- 16 57. GRAMMER/TODHD advertising admission. GRAMMER name linked to ESTAR.
- 17 58. MILLER'S internet sales of videos
- 18 59. SCHWARTZ'S e-mail correspondence to NELLE and subsequent correspondence.
- 19 60. Domain registrations of illegal businesses by CORNELL and HAYELAND OF,
- 20 GODSHOTS.TV AND GODSHOTS.ORG at the same address.
- 21 61. WILEMAN'S false lawsuit against PAEGELS and Steve Daubenspeck.
- 22 62. Sampling of LEWIS'S complaints against CORNELL for Identity Theft.
- 23 63. News article about HAYELAND and CORNELL theft investigation by Los Angeles
- 24 Police Department.
- 25 64. FARGOS' admission to stealing automobile from CarMax and false allegation against
- 26 LEWIS.
- 27 65. CORNELL copyright infringement of NELLE'S Iphone video.
- 28 66. Applications and COUNTY COUNSEL/PLUIM'S response to attempts to disqualify

- 1 PLUIM.
- 2 67. Sample of CORNELL'S internet selling.
- 3 68. City of Beverly Hills Business Tax Registration and Fees List
- 4 69. FANGARY documents showing harassment and unreasonable discovery demands.
- 5 70. NELLE'S motion for sanctions against FANGARY.
- 6 71. FANGARY'S e-mail demand.
- 7 72. FANGARY'S notice of ruling and copy of minute order.
- 8 73. DEMAND by NELLE for signed court order and cease and desist harassment and
9 extortion.
- 10 74. FANGARY e-mails.
- 11 75. SHERMAN'S standing order for "prevailing parties."
- 12 76. WARRANT NOTICE from Beverly Hills P.D. to LEWIS.
- 13 77. Order of Protection of MINORS against CORNELL.
- 14 78. State of California Fair Political Practices Commission 2006-2012 Form 700s
15 submitted by COLE, HAIGHT, WELCH, SHERMAN and PLUIM.
- 16 79. E-mail to agencies from CORNELL with false allegations against LEWIS.
- 17 80. MILLER and KING false reporting documentation and response letter from the City of
18 San Marino.
- 19 81. STELL'S perjured Affidavit of Sole Survivor and payout of funds that should have
20 been distributed to heirs under laws of intestacy.
- 21 82. One instance of CAMPION/STELL perjured testimony about a document that did not
22 exist.
- 23 83. Fraudulent Bank records submitted to the court by CAMPION/STELL (A-K) and
24 actual bank records received from the bank (L-AL).
- 25 84. NELLE'S M.S.C. BRIEF of issues against STELL and CAMPION including a list of
26 CAMPION'S disruptions/violations of discovery rules during STELL'S deposition.
- 27 85. HAIGHT'S ruling, undated and unsigned.
- 28 86. Some motions and Petition for Removal of Administrator filed by heirs not timely ruled

on by WELCH or HAIGHT, or at all.

87. COX'S false advertising of Event Staffing Professionals on lyrixenterprises.com.

88. Copyright catalogue showing "Event Staffing Professionals" is not copyrighted as claimed by COX in EXHIBIT 87.

89. Cross-promotional false advertising: KEITH'S ad for DBA: AV COMPUTER DOCTOR containing ad for COX'S Lyrix Enterprises.

90. LEWIS'S Godaddy registrations for Lyrix Enterprises as proof of COX'S infringement.

91. CORNELL'S Facebook containing false ad for "Recovery Godshots" book for sale and proof of infringement and other falsities.

92. Sworn Official Deposition of Gary A. Arbaugh.

93. WESTBROOK messages on SCOTT'S Facebook.

94. Proof by FARGO that LEWIS paid off his vehicle.

95. CARMAX payment history.

DATED:

SUBMITTED BY:

RICHARD LEWIS, *in propria persona* and *ex rel* as a Private Attorney General for Plaintiffs RICHARD LEWIS, RICHARD LEWIS III; LORRAINE LEWIS, SCOTT E. LEWIS, MINORS 1, 2, 3, 4; THOMAS W. PAEGEL; NELLE S. PAEGEL; THOMAS W.V. PAEGEL; THE BODY COMPANY SPORTS, INC.